

EXHIBIT 2



**DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.**

Case IDs GLOMAG-20297, GLOMAG-20905, GLOMAG-21186, GLOMAG-21187,
GLOMAG-19961, GLOMAG-19960

OFFICE OF FOREIGN ASSETS CONTROL

DESIGNATION AND BLOCKING MEMORANDUM

Pursuant to Executive Order 13818 of December 20, 2017, "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption," (the "Order"), 31 C.F.R. part 583 (the "Regulations"), section 203 of the International Emergency Economic Powers Act (50 U.S.C. § 1702), section 301 of the National Emergencies Act (50 U.S.C. § 1631), and section 301 of title 3, United States Code, I hereby determine, in consultation with the Secretary of State and the Attorney General, that the persons listed below, and further addressed in the attached evidentiary memoranda (Case IDs GLOMAG-19960, GLOMAG-19961, GLOMAG-20297, GLOMAG-20905, GLOMAG-21186, GLOMAG-21187) meet one or more of the criteria for designation set forth in the Order. Therefore, the persons listed below are designated pursuant to the Order and will now appear on the Office of Foreign Assets Control's list of Specially Designated Nationals and Blocked Persons (the "SDN List").

Individuals:

1. BOJKOV, Vassil Kroumov (a.k.a. BOZHKOVA, Vasil (Cyrillic: БОЖКОВ, ВАСИЛ); a.k.a. "Cherepa"; a.k.a. "The Skull"), 79 Vassil Levski Blvd, Sofia 1000, Bulgaria; Dubai, United Arab Emirates; DOB 29 Jul 1956; POB Velingrad, Bulgaria; nationality Bulgaria; Gender Male; Passport 440210366 (Bulgaria) expires 23 Aug 2023; alt. Passport 385950465 (Bulgaria) expires 11 Apr 2024; National ID No. 647475973 (Bulgaria) (individual) [GLOMAG].
2. PEEVSKI, Delyan Slavchev (Cyrillic: ПЕЕВСКИ, Делян Славчев), 7 Nezabravka Street, Floor 7, Ap. 28, Sofia 1113, Bulgaria; DOB 27 Jul 1980; POB Sofia, Bulgaria; nationality Bulgaria; Gender Male; Passport 383862880 (Bulgaria) expires 11 Mar 2021 (individual) [GLOMAG].
3. ZHELYAZKOV, Ilko Dimitrov (a.k.a. ZHELYAZKOV, Ilko Dimitrov), Bulgaria; DOB 08 Feb 1958; nationality Bulgaria; Gender Male (individual) [GLOMAG].

Entities:

1. DEPART OOD (a.k.a. DEKART OOD), 2A Krakra Str., Oborishte Distr., Sofia, Stolichna 1504, Bulgaria; Organization Established Date 2003; V.A.T. Number BG 131122494 (Bulgaria) [GLOMAG] (Linked To: VABO SYSTEMS EOOD).

2. DIGITAL SERVICES EAD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2003; V.A.T. Number BG 131131080 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
3. DOMINO GAMES OOD, 2E Prof. Petar Dzhidrov Str., R-N Studentski Distr, Sofia, Bulgaria; Organization Established Date 2014; V.A.T. Number BG 202884681 (Bulgaria) [GLOMAG] (Linked To: DECART OOD).
4. EDE 2 EOOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2002; V.A.T. Number BG 130855508 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
5. EUROBET OOD (a.k.a. EUROBET LTD. (Cyrillic: ЕВРОБЕТ – ООД)), 48 Sitnyakovo blvd., Poduyane Distr., fl. 4, Sofia, Stolichna 1505, Bulgaria; Organization Established Date 1996; V.A.T. Number BG 121179290 (Bulgaria) [GLOMAG] (Linked To: EUROBET PARTNERS OOD).
6. EUROBET PARTNERS OOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2016; Government Gazette Number 203950885 (Bulgaria) [GLOMAG] (Linked To: DIGITAL SERVICES EAD).
7. EUROBET TRADING EOOD, 48 Sitnyakovo blvd., Poduyane Distr., fl.4, Sofia, Stolichna 1505, Bulgaria; Organization Established Date 2013; V.A.T. Number BG 202647305 (Bulgaria) [GLOMAG] (Linked To: EUROBET OOD).
8. EUROFOOTBALL OOD (Cyrillic: ЕВРОФУТБОЛ – ООД) (a.k.a. EUROFOOTBALL LTD), 126, Tsar Boris Iiiti blvd., Krasno Selo Distr., Sofia, Stolichna 1612, Bulgaria; Organization Established Date 1993; V.A.T. Number BG 831036657 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).
9. EUROSADRUZHIE OOD (a.k.a. EUROSADRUZHIE LTD.; a.k.a. EUROSUDRUZHIE LTD.; a.k.a. EVROSADRUZHIE OOD; a.k.a. "EUROCOMPANY LTD."), 43 Moskovska Str., Sofia, Stolichna 1000; Bulgaria; Organization Established Date 2002; V.A.T. Number BG 130855554 (Bulgaria) [GLOMAG] (Linked To: VABO SYSTEMS EOOD).
10. GALENIT INVEST AD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2000; Government Gazette Number 130329006 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
11. LOTTERY DISTRIBUTIONS OOD (Cyrillic: ЛОТЕРИ ДИСТРИБЮШЪНС ООД) (a.k.a. LOTTERY DISTRIBUTIONS LTD), 1 Koloman Str., Krasno selo Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2004; Government Gazette Number 131251717 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).

12. MELIORA ACADEMICA EOOD (f.k.a. MELIORA AKADEMIKA), 2E Prof. P. Dzhidrov Str., Studentski Grad Distr., Sofia, Stolichna 1700, Bulgaria; Organization Established Date 2012; V.A.T. Number BG 202052161 (Bulgaria) [GLOMAG] (Linked To: DECART OOD).
13. ML BUILD EAD (a.k.a. ML BILD EAD), 2A Krakra Str., Oborishte Distr., Sofia, Stolichna 1527, Bulgaria; Organization Established Date 2008; V.A.T. Number BG 200108841 (Bulgaria) [GLOMAG] (Linked To: DECART OOD).
14. MOSTSTROY IZTOK AD (a.k.a. MOSTSTROY EAST AD), 3 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2009; Government Gazette Number 200112909 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
15. NATIONAL LOTTERY AD (Cyrillic: НАЦИОНАЛНА ЛОТАРИЯ АД) (a.k.a. NATIONAL LOTTARY), 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2013; V.A.T. Number BG 204061981 (Bulgaria) [GLOMAG] (Linked To: NOVE DEVELOPMENT EOOD).
16. NATIONAL LOTTERY OOD (a.k.a. NATIONAL LOTTERIES LTD.), 1 Koloman Str., Krasno selo Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2004; Government Gazette Number 131251674 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).
17. NOVE DEVELOPMENT EOOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2010; Government Gazette Number 201275656 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
18. NOVE INTERNAL EOOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2007; V.A.T. Number BG 175382860 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
19. NUMERICAL GAMES OOD (a.k.a. NUMERICAL GAMES LTD.), 1 Koloman Str., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2004; Government Gazette Number 131252477 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).
20. PROPERTY-VB OOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2006; Government Gazette Number 120598193 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
21. REX LOTO AD (a.k.a. REX LOTTO AD), 8 Silistra, Oborishte Distr., Sofia 1504, Bulgaria; Organization Established Date 2006; Government Gazette Number 175010714 (Bulgaria) [GLOMAG] (Linked To: VABO-2005 EOOD).

22. TRANS NOVE OOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2007; V.A.T. Number BG 175433597 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
23. VABO SYSTEMS EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2008; V.A.T. Number BG 200431052 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
24. VABO-2005 EOOD (a.k.a. VABO 2005 EOOD), 43 Moskovska, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2005; V.A.T. Number BG 131502906 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
25. VATO 2002 EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2002; Government Gazette Number 130839906 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
26. ADLER BG AD, 126, Tsar Boris III Str./blvd., R-N Krasno Selo Distr, Sofia, Stolichna 1612, Bulgaria; Organization Established Date 2009; Government Gazette Number 200874603 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
27. EFBET PARTNERS OOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; Government Gazette Number 204839749 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
28. EUROGROUP ENGINEERING EAD (a.k.a. EUROGROUP ENGINEERING AD), 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2010; Government Gazette Number 201043177 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
29. EVROBET - RUMANIA EOOD (a.k.a. EUROBET - ROMANIA EOOD), 63, Blvd. Shipchenski, Prohod Slatina Distr., Sofia, Stolichna 1574, Bulgaria; Organization Established Date 2010; Government Gazette Number 201220179 (Bulgaria) [GLOMAG] (Linked To: GAMES UNLIMITED OOD).
30. GAMES UNLIMITED OOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2013; Government Gazette Number 202621673 (Bulgaria) [GLOMAG] (Linked To: VB MANAGEMENT EOOD).
31. INTERNEWS 98 OOD, 126, Tsar Boris III Str./blvd., R-N Krasno Selo Distr, Sofia, Stolichna 1612, Bulgaria; Organization Established Date 1998; V.A.T. Number BG 121584837 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
32. LOTTERY BG OOD (a.k.a. LOTTERY BG LTD.), 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2014; Government Gazette Number 203018962 (Bulgaria) [GLOMAG] (Linked To: VABO 2012 EOOD).

33. NOVE PARTNERS OOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2007; Government Gazette Number 175392527 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).
34. OLD GAMES EOOD, 14 Iskar Str., Oborishte Distr., Sofia, Bulgaria; Organization Established Date 2010; Government Gazette Number 201084124 (Bulgaria) [GLOMAG] (Linked To: GAMES UNLIMITED OOD).
35. PRIM BG EAD, 126 Bul.Tsar Boris III Blvd., R-N Krasno Selo Distr, Sofia, Stolichna 1612, Bulgaria; Organization Established Date 2010; V.A.T. Number BG 201045769 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
36. SIGURO EOOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2005; Government Gazette Number 131567042 (Bulgaria) [GLOMAG] (Linked To: EUROGROUP ENGINEERING EAD).
37. VA BO COMPANY EOOD (a.k.a. VA BO KAMPANI EOOD), 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; Government Gazette Number 202066022 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
38. VABO 2008 EOOD, 43 Moskovska, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2008; Government Gazette Number 200481087 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
39. VABO 2012 EOOD (a.k.a. VABO 2012), 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; V.A.T. Number BG 201884835 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
40. VABO 2017 OOD (a.k.a. VABO 2017 LTD.), 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; V.A.T. Number BG 204811027 (Bulgaria) [GLOMAG] (Linked To: VABO 2012 EOOD).
41. VABO MANAGEMENT EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; Government Gazette Number 201884908 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
42. VB MANAGEMENT EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; Government Gazette Number 202080417 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
43. VERTEX PROPERTIES EOOD (a.k.a. VERTEX IMOTI EOOD), 126 Tsar Boris III Str./blvd., R-N Krasno Selo Distr, Sofia, Stolichna 1612, Bulgaria; Organization Established Date 2007; Government Gazette Number 175387373 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

44. VIHROGONIKA AD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2016; Government Gazette Number 203892599 (Bulgaria) [GLOMAG] (Linked To: VABO MANAGEMENT EOOD).
45. ANCIENT HERITAGE AD (Cyrillic: АНТИЧНО НАСЛЕДСТВО – АД), 105, Tsarigradsko shose str., Slatina Distr., Sofia, Stolichna 1113, Bulgaria; Organization Established Date 2011; V.A.T. Number BG 201673717 (Bulgaria) [GLOMAG] (Linked To: THRACE FOUNDATION).
46. BUL PARTNERS TRAVEL OOD (Cyrillic: БУЛ ПАРТНЕРС ТРАВЕЛ – ООД), 4, Trapezitsa, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 1997; V.A.T. Number BG 121211051 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
47. BULGARIAN SUMMER, Bulgaria; Organization Established Date Jan 2021; Organization Type: Activities of political organizations [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
48. BULLET TRADE OOD (a.k.a. "BULIT TRADE LTD"), 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2001; Government Gazette Number 121457476 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
49. CARITEX LUCKY AD (a.k.a. "KARITEKS LAKI AD"), 14, Iskar str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 1998; V.A.T. Number BG 121633825 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
50. CSKA BASKETBALL CLUB (Cyrillic: БАКЕТБОЛЕН КЛУБ ЦСКА) (a.k.a. PROFESIONALEN BASKETBOLEN KLUB TSSKA 48 AD; a.k.a. PROFESSIONAL BASKETBALL CLUB-CSKA-48 AD), Bul. Dragan Tsankov, N3, Stadion-Tsska, Sofia 1164, Bulgaria; Organization Established Date 2003; V.A.T. Number BG 131083632 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING AD).
51. KRISTIANO GR 53 JSC AD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; Government Gazette Number 204642716 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
52. NOVE-AD-HOLDING AD (Cyrillic: НОВЕ-АД-ХОЛДИНГ – АД), 43 Moskovsa, Oborishte Distr., Sofia 1000, Bulgaria; Organization Established Date 1991; V.A.T. Number BG 121024920 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
53. PARKSTROY-SOFIA OOD (Cyrillic: ПАРКСТРОЙ-СОФИЯ – ООД), Nadezhda 1 Distr., Bl. No 150, apt. 131, Sofia, Bulgaria; Organization Established Date 2002; V.A.T. Number BG 130939917 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING

AD).

54. PUBLISHING HOUSE SPORT LTD (a.k.a. "PUBLISHUNG HOUSE SPORT OOD"), sektor V Natsionalen Stadion V. Levski, Distr. Sredets Distr, Sofia, Bulgaria; Organization Established Date 1993; Government Gazette Number 831134806 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING AD).
55. SIZIF V OOD, Nadezhda 1 Distr., Sofia, Bulgaria; Organization Established Date 1996; V.A.T. Number BG 121136410 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
56. THRACE FOUNDATION, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2004; Government Gazette Number 131258494 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
57. TRAKIA-PAPIR 96 OOD (a.k.a. "TRAKIA-PAPER 96 OOD"), 9 Iskar, Oborishte Distr, Sofia, Bulgaria; Organization Established Date 1996; Government Gazette Number 121220666 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING AD).
58. VABO INTERNAL AD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; Government Gazette Number 204682034 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).
59. BM SYSTEMS EAD, 119 Ekzarh Yosif Str., Oborishte Distr., Sofia 1527, Bulgaria; Organization Established Date 2007; Registration Number 131382912 (Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD).
60. INT INVEST EOOD, 119 Ekzarh Yosif Str., Oborishte Distr., Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2019; V.A.T. Number BG 205535941 (Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD).
61. INT LTD EOOD, 119 Ul. Ekzarh Yosif Str., R-N Oborishte Distr, Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2017; V.A.T. Number BG 204589523 (Bulgaria) [GLOMAG] (Linked To: PEEVSKI, Delyan Slavchev).
62. INTRUST PLC EAD (a.k.a. INTRUST EAD), 119 Ekzarh Yosif Str., R-N Oborishte Distr, Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2017; Legal Entity Number 485100GBI2SE0KIX8T70; Registration Number 204589733 (Bulgaria) [GLOMAG] (Linked To: PEEVSKI, Delyan Slavchev).
63. INTTRAFIK EOOD (a.k.a. INTTRAFFIC EOOD), 119 Ekzarh Yosif Str., Oborishte Distr., Sofia 1527, Bulgaria; 102, Bulgaria blvd., Vitosha Distr., Apt. 59, Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2018; V.A.T. Number BG 205244843

(Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD).

64. REAL ESTATES INT LTD EOOD, 119 Ul. Ekzarh Yosif Str., R-N Oborishte Distr., Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2018; V.A.T. Number BG 204930572 (Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD).

Accordingly, except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, (1) all real, personal, and any other property and interests in property of the persons named above that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of U.S. persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in, and (2) any transaction or dealing by a U.S. person or within the United States in property or interests in property of the individuals named above is prohibited.

Additionally, except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are prohibited: (1) any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions contained in the Order or the Regulations; and (2) any conspiracy formed to violate any of the prohibitions in the Order or the Regulations.

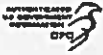
The President has found in Section 7 of the Order that, because of the ability to transfer funds or other assets instantaneously, prior notice to persons designated pursuant to the Order of measures to be taken pursuant to the Order would render these measures ineffectual. Accordingly, I find that no prior notice should be afforded any individual or entity named above because to do so would provide an opportunity to evade the measures authorized by the Order and, consequently, render those measures ineffectual towards addressing the national emergency declared in the Order.

**Bradley T.
Smith**

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T. Smith
Date: 2021.06.02 07:11:12
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Date

Bradley T. Smith
Acting Director
Office of Foreign Assets Control



once every four years at interlockings, control points, and other signal locations controlled by solid-state microprocessor-based equipment.

A copy of the petition, as well as any written communications concerning the petition, is available for review online at www.regulations.gov.

Interested parties are invited to participate in these proceedings by submitting written views, data, or comments. FRA does not anticipate scheduling a public hearing in connection with these proceedings since the facts do not appear to warrant a hearing. If any interested party desires an opportunity for oral comment and a public hearing, they should notify FRA, in writing, before the end of the comment period and specify the basis for their request.

All communications concerning these proceedings should identify the appropriate docket number and may be submitted by any of the following methods:

- **Website:** <http://www.regulations.gov>. Follow the online instructions for submitting comments.
- **Fax:** 202-493-2251.
- **Mail:** Docket Operations Facility, U.S. Department of Transportation (DOT), 1200 New Jersey Ave. SE, W12-140, Washington, DC 20590.

Communications received by July 23, 2021 will be considered by FRA before final action is taken. Comments received after that date will be considered if practicable.

Anyone can search the electronic form of any written communications and comments received into any of our dockets by the name of the individual submitting the comment (or signing the document, if submitted on behalf of an association, business, labor union, etc.). Under 5 U.S.C. 553(c), DOT solicits comments from the public to better inform its processes. DOT posts these comments, without edit, including any personal information the commenter provides, to www.regulations.gov, as described in the system of records notice (DOT/ALL-14 FDMS), which can be reviewed at <https://www.transportation.gov/privacy>. See also <https://www.regulations.gov/privacy-notice> for the privacy notice of www.regulations.gov.

Issued in Washington, DC.

John Karl Alexy,
Associate Administrator for Railroad Safety,
Chief Safety Officer.

[FR Doc. 2021-11964 Filed 6-7-21; 8:45 am]
BILLING CODE 4910-06-P

DEPARTMENT OF TRANSPORTATION

Office of the Secretary

Elizabeth Betsy Pope d/b/a Eastgate Laboratory Testing and Mounir R. Khouri; Removal From the Public Interest Exclusion List

AGENCY: Office of the Secretary, DOT.
ACTION: Notice.

SUMMARY: The Department of Transportation (DOT) issued a decision and order under the Procedures for Transportation Workplace Drug and Alcohol Testing Programs excluding a service agent, Elizabeth "Betsy" Pope d/b/a Eastgate Laboratory Testing in Tennessee and all other places doing business, and all other individuals who are employees or all other individuals associated with Ms. Pope and Eastgate Laboratory Testing, from providing drug and alcohol testing services in any capacity to any DOT-regulated employer for a period of 5 years. Ms. Pope and her company provided Medical Review Officer services to DOT-regulated employers directly and through other service agents when Ms. Pope was not qualified to act as a Medical Review Officer. The 5-year period has ended and Ms. Pope, et al., have been removed from the list of excluded service agents.

DATES: This Notice is effective as of January 21, 2021.

FOR FURTHER INFORMATION CONTACT: Bohdan Baczara, Deputy Director, U.S. Department of Transportation, Office of Drug and Alcohol Policy and Compliance, 1200 New Jersey Avenue SE, Washington, DC 20590; (202) 366-3784 (voice), (202) 366-3897 (fax), or Bohdan.Baczara@dot.gov.

SUPPLEMENTARY INFORMATION: The Department of Transportation (DOT) issued a decision and order under the Procedures for Transportation Workplace Drug and Alcohol Testing Programs excluding a service agent, Mounir R. Khouri d/b/a Mobile Testing Services, Inc., in Vermont and all other places it is incorporated, franchised, or otherwise doing business, and all other individuals who are officers, employees, directors, shareholders, partners, or other individuals associated with Mr. Khouri and Mobile Testing Services, Inc., from providing drug and alcohol testing services in any capacity to any DOT-regulated employer for a period of 5 years. Mr. Khouri and his company provided Medical Review Officer services to DOT-regulated employers directly and through other service agents when Mr. Khouri was not qualified to act as a Medical Review Officer. The 5-year period has ended

and Mr. Khouri, et al., have been removed from the list of excluded service agents.

The Department published notice of the Public Interest Exclusion for Elizabeth Betsy Pope, et al., on August 24, 2015 (80 FR 51349) and for Mounir R. Khouri, et al., on January 27, 2016 (81 FR 4739). The exclusions were for 5-year periods, respectively, which have now run their term. We have removed Ms. Pope and Mr. Khouri from the DOT's list of Public Interest Exclusions on our website at: <http://www.transportation.gov/odapc/pie>. We are also notifying the public of the removal by publishing this Federal Register notice as required by 49 CFR 40.401(d).

Issued on May 20, 2021, in Washington, DC.

Bohdan Baczara,
Deputy Director, Office of Drug and Alcohol Policy Compliance.

[FR Doc. 2021-11902 Filed 6-7-21; 8:45 am]
BILLING CODE 4910-0X-P

DEPARTMENT OF THE TREASURY

Office of Foreign Assets Control

Notice of OFAC Sanctions Actions

AGENCY: Office of Foreign Assets Control, Treasury.
ACTION: Notice.

SUMMARY: The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is publishing the names of one or more persons that have been placed on OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) based on OFAC's determination that one or more applicable legal criteria were satisfied. All property and interests in property subject to U.S. jurisdiction of these persons are blocked, and U.S. persons are generally prohibited from engaging in transactions with them.

DATES: See Supplementary Information section for effective date(s).

FOR FURTHER INFORMATION CONTACT: OFAC: Andrea Gacki, Director, tel.: 202-622-2490; Associate Director for Global Targeting, tel.: 202-622-2420; Assistant Director for Licensing, tel.: 202-622-2480; Assistant Director for Regulatory Affairs, tel.: 202-622-4855; or the Assistant Director for Sanctions Compliance & Evaluation, tel.: 202-622-2490.

SUPPLEMENTARY INFORMATION:

Electronic Availability

The Specially Designated Nationals and Blocked Persons List and additional

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information concerning OFAC sanctions programs are available on OFAC's website (<https://www.treasury.gov/ofac>).

Notice of OFAC Action(s)

On June 2, 2021, OFAC determined that the property and interests in property subject to U.S. jurisdiction of

the following persons are blocked under the relevant sanctions authorities listed below.

BILLING CODE 4810-AL-P

Individuals:

1. BOJKOV, Vassil Kroumov (a.k.a. BOZHKOVA, Vasil (Cyrillic: БОЖКОВ, ВАСИЛ); a.k.a. "Cherepa"; a.k.a. "The Skull"), 79 Vassil Levski Blvd, Sofia 1000, Bulgaria; Dubai, United Arab Emirates; DOB 29 Jul 1956; POB Velingrad, Bulgaria; nationality Bulgaria; Gender Male; Passport 440210366 (Bulgaria) expires 23 Aug 2023; alt. Passport 385950465 (Bulgaria) expires 11 Apr 2024; National ID No. 647475973 (Bulgaria) (individual) [GLOMAG].

Designated pursuant to section 1(a)(iii)(A)(1) of Executive Order 13818 of December 20, 2017, "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption," 82 FR 60839, 3 CFR, 2018 Comp., p. 399, (E.O. 13818) for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery that is conducted by a foreign person.

2. PEEVSKI, Delyan Slavchev (Cyrillic: ПЕЕВСКИ, Делян Славчев), 7 Nezabavka Street, Floor 7, Ap. 28, Sofia 1113, Bulgaria; DOB 27 Jul 1980; POB Sofia, Bulgaria; nationality Bulgaria; Gender Male; Passport 383862880 (Bulgaria) expires 11 Mar 2021 (individual) [GLOMAG].

Designated pursuant to section 1(a)(ii)(B)(1) of E.O. 13818 for being a foreign person who is a current or former government official, or a person acting for or on behalf of such an official, who is responsible for or complicit in, or has directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

3. ZHELIAZKOV, Ilko Dimitrov (a.k.a. ZHELIAZKOV, Ilko Dimitrov), Bulgaria; DOB 08 Feb 1958; nationality Bulgaria; Gender Male (individual) [GLOMAG].

Designated pursuant to section 1(a)(ii)(B)(1) of E.O. 13818 for being a foreign person who is a current or former government official, or a person acting for or on behalf of such

an official, who is responsible for or complicit in, or has directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

Entities:

1. DECART OOD (a.k.a. DEKART OOD), 2A Krakra Str., Oborishte Distr., Sofia, Stolichna 1504, Bulgaria; Organization Established Date 2003; V.A.T. Number BG 131122494 (Bulgaria) [GLOMAG] (Linked To: VABO SYSTEMS EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, VABO SYSTEMS EOOD, a person whose property and interests in property are blocked pursuant to this order.

2. DIGITAL SERVICES EAD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2003; V.A.T. Number BG 131131080 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

3. DOMINO GAMES OOD, 2E Prof. Petar Dzhidrov Str., R-N Studentski Distr, Sofia, Bulgaria; Organization Established Date 2014; V.A.T. Number BG 202884681 (Bulgaria) [GLOMAG] (Linked To: DECART OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, DECART OOD, a person whose property and interests in property are blocked pursuant to this order.

4. EDE 2 EOOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2002; V.A.T. Number BG 130855508 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

5. EUROBET OOD (a.k.a. EUROBET LTD. (Cyrillic: ЕВРОБЕТ – ООД)), 48 Sitnyakovo blvd., Poduyane Distr., fl. 4, Sofia, Stolichna 1505, Bulgaria; Organization Established Date 1996; V.A.T. Number BG 121179290 (Bulgaria) [GLOMAG] (Linked To: EUROBET PARTNERS OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly,

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EUROBET PARTNERS OOD, a person whose property and interests in property are blocked pursuant to this order.

6. EUROBET PARTNERS OOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2016; Government Gazette Number 203950885 (Bulgaria) [GLOMAG] (Linked To: DIGITAL SERVICES EAD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, DIGITAL SERVICES EAD, a person whose property and interests in property are blocked pursuant to this order.

7. EUROBET TRADING EOOD, 48 Sitnyakovo blvd., Poduyane Distr., fl.4, Sofia, Stolichna 1505, Bulgaria; Organization Established Date 2013; V.A.T. Number BG 202647305 (Bulgaria) [GLOMAG] (Linked To: EUROBET OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, EUROBET OOD, a person whose property and interests in property are blocked pursuant to this order.

8. EUROFOOTBALL OOD (Cyrillic: ЕВРОФУТБОЛ – ООД) (a.k.a. EUROFOOTBALL LTD), 126, Tsar Boris Iiiti blvd., Krasno Selo Distr., Sofia, Stolichna 1612, Bulgaria; Organization Established Date 1993; V.A.T. Number BG 831036657 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, EUROSADRUZHIE OOD, a person whose property and interests in property are blocked pursuant to this order.

9. EUROSADRUZHIE OOD (a.k.a. EUROSADRUZHIE LTD.; a.k.a. EUROSUDRUZHIE LTD.; a.k.a. EVROSADRUZHIE OOD; a.k.a. "EUROCOMPANY LTD."), 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2002; V.A.T. Number BG 130855554 (Bulgaria) [GLOMAG] (Linked To: VABO SYSTEMS EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, VABO SYSTEMS EOOD, a person whose property and interests in property are blocked pursuant to this order.

10. GALENIT INVEST AD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2000; Government Gazette Number 130329006 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

11. LOTTERY DISTRIBUTIONS OOD (Cyrillic: ЛОТЕРИ ДИСТРИБЮШЪНС ООД) (a.k.a. LOTTERY DISTRIBUTIONS LTD), 1 Koloman Str., Krasno selo Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2004; Government Gazette Number 131251717 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, EUROSADRUZHIE OOD, a person whose property and interests in property are blocked pursuant to this order.

12. MELIORA ACADEMICA EOOD (f.k.a. MELIORA AKADEMIKA), 2E Prof. P. Dzhidrov Str., Studentski Grad Distr., Sofia, Stolichna 1700, Bulgaria; Organization Established Date 2012; V.A.T. Number BG 202052161 (Bulgaria) [GLOMAG] (Linked To: DECART OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, DECART OOD, a person whose property and interests in property are blocked pursuant to this order.

13. ML BUILD EAD (a.k.a. ML BILD EAD), 2A Krakra Str., Oborishte Distr., Sofia, Stolichna 1527, Bulgaria; Organization Established Date 2008; V.A.T. Number BG 200108841 (Bulgaria) [GLOMAG] (Linked To: DECART OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, DECART OOD, a person whose property and interests in property are blocked pursuant to this order.

14. MOSTSTROY IZTOK AD (a.k.a. MOSTSTROY EAST AD), 3 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2009; Government Gazette Number 200112909 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

15. NATIONAL LOTTERY AD (Cyrillic: НАЦИОНАЛНА ЛОТАРИЯ АД) (a.k.a. NATIONAL LOTTARY), 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2013; V.A.T. Number BG 204061981 (Bulgaria) [GLOMAG] (Linked To: NOVE DEVELOPMENT EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE DEVELOPMENT EOOD, a person whose property and interests in property are blocked pursuant to this order.

16. NATIONAL LOTTERY OOD (a.k.a. NATIONAL LOTTERIES LTD.), 1 Koloman Str., Krasno selo Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2004;

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Government Gazette Number 131251674 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, EUROSADRUZHIE OOD, a person whose property and interests in property are blocked pursuant to this order.

17. NOVE DEVELOPMENT EOOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2010; Government Gazette Number 201275656 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

18. NOVE INTERNAL EOOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2007; V.A.T. Number BG 175382860 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

19. NUMERICAL-GAMES OOD (a.k.a. NUMERICAL GAMES LTD.), 1 Koloman Str., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2004; Government Gazette Number 131252477 (Bulgaria) [GLOMAG] (Linked To: EUROSADRUZHIE OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, EUROSADRUZHIE OOD, a person whose property and interests in property are blocked pursuant to this order.

20. PROPERTY-VB OOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2006; Government Gazette Number 120598193 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

21. REX LOTO AD (a.k.a. REX LOTTO AD), 8 Silistra, Oborishte Distr., Sofia 1504, Bulgaria; Organization Established Date 2006; Government Gazette Number 175010714 (Bulgaria) [GLOMAG] (Linked To: VABO-2005 EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, VABO-

2005 EOOD person whose property and interests in property are blocked pursuant to this order.

22. TRANS NOVE OOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2007; V.A.T. Number BG 175433597 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

23. VABO SYSTEMS EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2008; V.A.T. Number BG 200431052 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

24. VABO-2005 EOOD (a.k.a. VABO 2005 EOOD), 43 Moskovska, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2005; V.A.T. Number BG 131502906 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

25. VATO 2002 EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2002; Government Gazette Number 130839906 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

26. ADLER BG AD, 126, Tsar Boris III Str./blvd., R-N Krasno Selo Distr, Sofia, Stolichna 1612, Bulgaria; Organization Established Date 2009; Government Gazette Number 200874603 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

27. EFBET PARTNERS OOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; Government Gazette Number 204839749 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

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Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

28. EUROGROUP ENGINEERING EAD (a.k.a. EUROGROUP ENGINEERING AD), 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2010; Government Gazette Number 201043177 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

29. EVROBET - RUMANIA EOOD (a.k.a. EUROBET - ROMANIA EOOD), 63, Blvd. Shipchenski, Prohod Slatina Distr., Sofia, Stolichna 1574, Bulgaria; Organization Established Date 2010; Government Gazette Number 201220179 (Bulgaria) [GLOMAG] (Linked To: GAMES UNLIMITED OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, GAMES UNLIMITED OOD, a person whose property and interests in property are blocked pursuant to this order.

30. GAMES UNLIMITED OOD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2013; Government Gazette Number 202621673 (Bulgaria) [GLOMAG] (Linked To: VB MANAGEMENT EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, VB MANAGEMENT EOOD, a person whose property and interests in property are blocked pursuant to this order.

31. INTERNEWS 98 OOD, 126, Tsar Boris III Str./blvd., R-N Krasno Selo Distr, Sofia, Stolichna 1612, Bulgaria; Organization Established Date 1998; V.A.T. Number BG 121584837 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

32. LOTTERY BG OOD (a.k.a. LOTTERY BG LTD.), 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2014; Government Gazette Number 203018962 (Bulgaria) [GLOMAG] (Linked To: VABO 2012 EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, VABO

2012 EOOD, a person whose property and interests in property are blocked pursuant to this order.

33. NOVE PARTNERS OOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2007; Government Gazette Number 175392527 (Bulgaria) [GLOMAG] (Linked To: NOVE INTERNAL EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE INTERNAL EOOD, a person whose property and interests in property are blocked pursuant to this order.

34. OLD GAMES EOOD, 14 Iskar Str., Oborishte Distr., Sofia, Bulgaria; Organization Established Date 2010; Government Gazette Number 201084124 (Bulgaria) [GLOMAG] (Linked To: GAMES UNLIMITED OOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, GAMES UNLIMITED OOD, a person whose property and interests in property are blocked pursuant to this order.

35. PRIM BG EAD, 126 Bul. Tsar Boris III Blvd., R-N Krasno Selo Distr, Sofia, Stolichna 1612, Bulgaria; Organization Established Date 2010; V.A.T. Number BG 201045769 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

36. SIGURO EOOD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2005; Government Gazette Number 131567042 (Bulgaria) [GLOMAG] (Linked To: EUROGROUP ENGINEERING EAD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, EUROGROUP ENGINEERING EAD, a person whose property and interests in property are blocked pursuant to this order.

37. VA BO COMPANY EOOD (a.k.a. VA BO KAMPANI EOOD), 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; Government Gazette Number 202066022 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

38. VABO 2008 EOOD, 43 Moskovska, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2008; Government Gazette Number 200481087 (Bulgaria) [GLOMAG]

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(Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

39. VABO 2012 EOOD (a.k.a. VABO 2012), 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; V.A.T. Number BG 201884835 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

40. VABO 2017 OOD (a.k.a. VABO 2017 LTD.), 43 Moskovska Str., R-N Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; V.A.T. Number BG 204811027 (Bulgaria) [GLOMAG] (Linked To: VABO 2012 EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, VABO 2012 EOOD, a person whose property and interests in property are blocked pursuant to this order.

41. VABO MANAGEMENT EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; Government Gazette Number 201884908 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, person whose property and interests in property are blocked pursuant to this order.

42. VB MANAGEMENT EOOD, 43 Moskovska Str., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2012; Government Gazette Number 202080417 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

43. VERTEX PROPERTIES EOOD (a.k.a. VERTEX IMOTI EOOD), 126 Tsar Boris III Str./blvd., R-N Krasno Selo Distr., Sofia, Stolichna 1612, Bulgaria; Organization Established Date 2007; Government Gazette Number 175387373 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly,

BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

44. VIHROGONIKA AD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2016; Government Gazette Number 203892599 (Bulgaria) [GLOMAG] (Linked To: VABO MANAGEMENT EOOD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, VABO MANAGEMENT EOOD, a person whose property and interests in property are blocked pursuant to this order.

45. ANCIENT HERITAGE AD (Cyrillic: АНТИЧНО НАСЛЕДСТВО – АД), 105, Tsarigradsko shose str., Slatina Distr., Sofia, Stolichna 1113, Bulgaria, Organization Established Date 2011; V.A.T. Number BG 201673717 (Bulgaria) [GLOMAG] (Linked To: THRACE FOUNDATION).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, THRACE FOUNDATION, a person whose property and interests in property are blocked pursuant to this order.

46. BUL PARTNERS TRAVEL OOD (Cyrillic: БУЛ ПАРТНЕРС ТРАВЕЛ – ООД), 4, Trapezitsa, Sofia, Stolichna 1000, Bulgaria, Organization Established Date 1997; V.A.T. Number BG 121211051 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

47. BULGARIAN SUMMER, Bulgaria; Organization Established Date Jan 2021; Organization Type: Activities of political organizations [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

48. BULLET TRADE OOD (a.k.a. "BULIT TRADE LTD"), 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria, Organization Established Date 2001; Government Gazette Number 121457476 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

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49. CARITEX LUCKY AD (a.k.a. "KARITEKS LAKI AD"), 14, Iskar str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 1998; V.A.T. Number BG 121633825 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

50. CSKA BASKETBALL CLUB (Cyrillic: БАКЕТБОЛЕН КЛУБ ЦСКА) (a.k.a. PROFESIONALEN BASKETBOLEN KLUB TSSKA 48 AD; a.k.a. PROFESSIONAL BASKETBALL CLUB-CSKA-48 AD), Bul. Dragan Tsankov, N3, Stadion-Tsska, Sofia 1164, Bulgaria; Organization Established Date 2003; V.A.T. Number BG 131083632 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING AD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE-AD-HOLDING AD, a person whose property and interests in property are blocked pursuant to this order.

51. KRISTIANO GR 53 JSC AD, 43 Moskovska Str., Oborishte Distr., Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; Government Gazette Number 204642716 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

52. NOVE-AD-HOLDING AD (Cyrillic: НОВЕ-АД-ХОЛДИНГ – АД), 43 Moskovska, Oborishte Distr., Sofia 1000, Bulgaria; Organization Established Date 1991; V.A.T. Number BG 121024920 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

53. PARKSTROY-SOFIA OOD (Cyrillic: ПАРКСТРОЙ-СОФИЯ – ООД), Nadezhda 1 Distr., Bl. No 150, apt. 131, Sofia, Bulgaria; Organization Established Date 2002; V.A.T. Number BG 130939917 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING AD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE-AD-HOLDING AD, a person whose property and interests in property are blocked pursuant to this order.

54. PUBLISHING HOUSE SPORT LTD (a.k.a. "PUBLISHING HOUSE SPORT OOD"), sektor V Natsionalen Stadion V. Levski, Distr. Sredets Distr, Sofia, Bulgaria,

Organization Established Date 1993; Government Gazette Number 831134806 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING AD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE-AD-HOLDING AD, a person whose property and interests in property are blocked pursuant to this order.

55. SIZIF V OOD, Nadezhda 1 Distr., Sofia, Bulgaria; Organization Established Date 1996; V.A.T. Number BG 121136410 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

56. THRACE FOUNDATION, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2004; Government Gazette Number 131258494 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

57. TRAKIA-PAPIR 96 OOD (a.k.a. "TRAKIA-PAPER 96 OOD"), 9 Iskar, Oborishte Distr, Sofia, Bulgaria; Organization Established Date 1996; Government Gazette Number 121220666 (Bulgaria) [GLOMAG] (Linked To: NOVE-AD-HOLDING AD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, NOVE-AD-HOLDING AD, a person whose property and interests in property are blocked pursuant to this order.

58. VABO INTERNAL AD, 43 Moskovska Str., R-N Oborishte Distr, Sofia, Stolichna 1000, Bulgaria; Organization Established Date 2017; Government Gazette Number 204682034 (Bulgaria) [GLOMAG] (Linked To: BOJKOV, Vassil Kroumov).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, BOJKOV, Vassil Kroumov, a person whose property and interests in property are blocked pursuant to this order.

59. BM SYSTEMS EAD, 119 Ekzarh Yosif Str., Oborishte Distr., Sofia 1527, Bulgaria; Organization Established Date 2007; Registration Number 131382912 (Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD)

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly,

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INTRUST PLC EAD, a person whose property and interests in property are blocked pursuant to this order.

60. INT INVEST EOOD, 119 Ekzarh Yosif Str., Oborishte Distr., Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2019; V.A.T. Number BG 205535941 (Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, INTRUST PLC EAD, a person whose property and interests in property are blocked pursuant to this order.

61. INT LTD EOOD, 119 Ul. Ekzarh Yosif Str., R-N Oborishte Distr, Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2017; V.A.T. Number BG 204589523 (Bulgaria) [GLOMAG] (Linked To: PEEVSKI, Delyan Slavchev).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, PEEVSKI, Delyan Slavchev, a person whose property and interests in property are blocked pursuant to this order.

62. INTRUST PLC EAD (a.k.a. INTRUST EAD), 119 Ekzarh Yosif Str., R-N Oborishte Distr, Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2017; Legal Entity Number 485100GBI2SE0KIX8T70; Registration-Number-204589733 (Bulgaria) [GLOMAG] (Linked To: PEEVSKI, Delyan Slavchev).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, PEEVSKI, Delyan Slavchev, a person whose property and interests in property are blocked pursuant to this order.

63. INTTRAFIK EOOD (a.k.a. INTTRAFFIC EOOD), 119 Ekzarh Yosif Str., Oborishte Distr., Sofia 1527, Bulgaria; 102, Balcaria blvd., Vitosha Distr., Apt. 59, Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2018; V.A.T. Number BG 205244843 (Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, INTRUST PLC EAD, a person whose property and interests in property are blocked pursuant to this order.

64. REAL ESTATES INT LTD EOOD, 119 Ul. Ekzarh Yosif Str., R-N Oborishte Distr., Sofia 1527, Bulgaria; 79, Ralevitsa Str., Vitosha Distr., Sofia, Stolichna 1618, Bulgaria; Organization Established Date 2018; V.A.T. Number BG 204930572 (Bulgaria) [GLOMAG] (Linked To: INTRUST PLC EAD).

Designated pursuant to section 1(a)(iii)(B) of E.O. 13818 for being owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly,

INTRUST PLC EAD, a person whose property and interests in property are blocked pursuant to this order.

Dated: June 2, 2021.

Bradley T. Smith,

Acting Director, Office of Foreign Assets Control.

[FR Doc. 2021-11897 Filed 6-7-21; 8:45 am]

BILLING CODE 4810-AL-C

DEPARTMENT OF THE TREASURY

Internal Revenue Service

Electronic Tax Administration Advisory Committee (ETAAC); Notice of Virtual Public Meeting

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Notice of meeting.

SUMMARY: The Electronic Tax Administration Advisory Committee (ETAAC) will hold a virtual public meeting on Wednesday, June 23, 2021.

FOR FURTHER INFORMATION CONTACT: Mr. Sean Parman, Office of National Public Liaison, at (202) 317-6247, or send an email to publicliaison@irs.gov.

SUPPLEMENTARY INFORMATION: Notice is hereby given pursuant to section 10(a)(2) of the Federal Advisory Committee Act, 5 U.S.C. App. (1988), that a virtual public meeting of the ETAAC will be held on Wednesday, June 23, 2021 from 9:00 a.m. to 11:00 a.m. EDT. The purpose of the ETAAC is to provide continuing advice regarding the development and implementation of the IRS organizational strategy for electronic tax administration. ETAAC is an organized public forum for discussion of electronic tax administration issues such as prevention of identity theft and refund fraud. It supports the overriding goal that paperless filing should be the preferred and most convenient method of filing tax and information returns. ETAAC members convey the public's perceptions of IRS electronic tax administration activities, offer constructive observations about current or proposed policies, programs, and procedures, and suggest improvements. Please call or email Sean Parman to confirm your attendance. Mr. Parman can be reached at 202-317-6247 or PublicLiaison@irs.gov. Should you wish the ETAAC to consider a written statement, please call 202-317-6247 or email: PublicLiaison@irs.gov.

Dated: June 2, 2021.

John Lipold,

Designated Federal Official Branch Chief, National Public Liaison.

[FR Doc. 2021-11913 Filed 6-7-21; 8:45 am]

BILLING CODE 4830-01-P

DEPARTMENT OF THE TREASURY

United States Mint

Notification of Citizens Coinage Advisory Committee June 15-16, 2021, Public Meeting

ACTION: Notice of meeting.

Pursuant to United States Code, Title 31, section 5135(b)(8)(C), the United States Mint announces the Citizens Coinage Advisory Committee (CCAC) teleconference public meeting scheduled for June 15-16, 2021.

Date: June 15, 2021 and June 16, 2021.
Time: 12:30-4:30 p.m. (ET) on June 15, 2021, and 10:00 a.m.-4:15 p.m. (ET) on June 16, 2021.

Location: This meeting will occur via teleconference. Interested members of the public may dial in to listen to the meeting at (888) 330-1716; Access Code: 1137147.

Subject: Review and discussion of the obverse and reverse candidate designs for the 2022 Negro Leagues Baseball Commemorative Coin (*Pub. L. 116-209*); obverse and reverse candidate designs for the Merrill's Marauders Congressional Gold Medal (*Pub. L. 116-170*); obverse and reverse candidate designs for the 2022 Purple Heart Hall of Honor Commemorative Coin (*Pub. L. 116-247*); and candidate designs for the 2022 American Women Quarters (*Pub. L. 116-330*).

Interested persons should call the CCAC HOTLINE at (202) 354-7502 for the latest update on meeting time and access information.

The CCAC advises the Secretary of the Treasury on any theme or design proposals relating to circulating coinage, bullion coinage, Congressional Gold Medals, and national and other medals; advises the Secretary of the Treasury with regard to the events, persons, or places to be commemorated by the issuance of commemorative coins in each of the five calendar years succeeding the year in which a commemorative coin designation is made; and makes recommendations with respect to the mintage level for any commemorative coin recommended.

For members of the public interested in listening in to the provided call number, this is a reminder that the public attendance is for listening purposes only. Any member of the public interested in submitting matters for the CCAC's consideration is invited to submit them by email to info@ccac.gov.

For Accommodation Request: If you need an accommodation to listen to the CCAC meeting, please contact the Diversity Management and Civil Rights Office by June 9, 2021 at 202-354-7260 or 1-888-646-8369 (TYY).

FOR FURTHER INFORMATION CONTACT: Jennifer Warren, United States Mint Liaison to the CCAC; 801 9th Street NW; Washington, DC 20220; or call 202-354-7208.

(Authority: 31 U.S.C. 5135(b)(8)(C))

Eric Anderson,

Executive Secretary, United States Mint.

[FR Doc. 2021-11936 Filed 6-7-21; 8:45 am]

BILLING CODE P

DEPARTMENT OF VETERANS AFFAIRS

Advisory Committee: VA National Academic Affiliations Council, Notice of Meeting

The Department of Veterans Affairs (VA) gives notice under the Federal Advisory Committee Act that, 5 U.S.C. App. 2, the VA National Academic Affiliations Council (Council) will meet via conference call on July 15, from 1:00 p.m. to 3:00 p.m. EST. The meeting is open to the public.

The purpose of the Council is to advise the Secretary on matters affecting partnerships between VA and its academic affiliates.

On July 15, 2021, the Council will receive a report on the recently held VA Minority Summit; discussion on research priorities and relationships; and status of VA's Electronic Health Record implementation. The Council will receive public comments from 2:50 p.m. to 2:55 p.m. EST.

Interested persons may attend and/or present oral statements to the Council. The dial in number to attend the conference call is: 669-254-5252. At the prompt, enter meeting ID 161 174 4403, then press #. The meeting passcode is 590228, then press #. Individuals seeking to present oral statements are invited to submit a 1-2 page summary

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U.S. DEPARTMENT OF THE TREASURY

Treasury Sanctions Influential Bulgarian Individuals and Their Expansive Networks for Engaging in Corruption

June 2, 2021

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned three Bulgarian individuals for their extensive roles in corruption in Bulgaria, as well as their networks encompassing 64 entities. The Administration believes corruption degrades the rule of law, weakens economies and economic growth, undermines democratic institutions, perpetuates conflict, and deprives innocent civilians of fundamental human rights, and today's action — the single largest action targeting corruption to date — demonstrates the Department of the Treasury's ongoing effort to hold accountable those involved in corruption. The U.S. government will continue to impose tangible and significant consequences on those who engage in corruption and work to protect the global financial system from abuse.

"The United States stands with all Bulgarians who strive to root out corruption by promoting accountability for corrupt officials who undermine the economic functions and democratic institutions of Bulgaria," said Office of Foreign Assets Control Director Andrea M. Gacki. "Not only does corruption deprive citizens of resources, it can erode the institutions intended to protect them. This designation under the Global Magnitsky sanctions program shows that we are committed to combatting corruption wherever it may be."

This action targets **Vassil Kroumov Bojkov**, a prominent Bulgarian businessman and oligarch; **Delyan Slavchev Peevski**, a former Member of Parliament; **Ilko Dimitrov Zhelyazkov**, the former Deputy Chief of the Bulgarian State Agency for Technical Operations who was appointed to the National Bureau for Control on Special Intelligence-Gathering Devices; and the companies owned or controlled by the respective individuals. These individuals and entities are designated pursuant to Executive Order (E.O.) 13818, which builds upon and implements the Global Magnitsky Human Rights Accountability Act and targets perpetrators of serious human rights abuse and corruption around the world. These sanctions coincide with complementary actions taken by the U.S. Department of State to publicly designate **Peevski** and **Zhelyazkov**, among others, under Section 7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act due to their involvement in significant corruption.

U.S. COMMITMENT TO TARGETING CORRUPTION

Today's designations constitute the largest Global Magnitsky action taken on a single day in the history of the program, targeting over 65 individuals and entities for their significant acts of corruption in Bulgaria.

The corrupt activities undertaken by the individuals designated today demonstrate how pervasive corruption goes hand-in-hand with other illicit activity. The breadth of today's action shows that the

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<https://home.treasury.gov/news/press-releases/jy0208>

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United States will support the rule of law and impose costs on public officials and those connected to them who use government institutions for personal profit. Today's designation exposes **Bojkov**, **Peevski**, and **Zhelyazkov** for abusing public institutions for profit and cuts off these individuals' and their companies' access to the U.S. financial system. To further protect the international financial system from abuse by corrupt actors, Treasury encourages all governments to implement appropriate and effective anti-money laundering measures to address corruption vulnerabilities.

These actions send a strong signal that the United States stands with all Bulgarians who strive to root out corruption. We are committed to helping our partners realize their full economic and democratic potential by tackling systemic corruption and holding corrupt officials accountable. Treasury remains committed to working with Bulgaria to address money laundering reforms that lead to financial transparency and accountability. We call upon regulators to communicate the risks of doing business with these corrupt officials and their companies.

VASSIL KROUMOV BOJKOV AND HIS NETWORK

Vassil Kroumov Bojkov (Bojkov), a Bulgarian businessman and oligarch, has bribed government officials on several occasions. These officials include a current political leader and the former Chairman of the now-abolished State Commission on Gambling (SCG). **Bojkov** also planned to provide a sum of money to a former Bulgarian official and a Bulgarian politician earlier this year to help **Bojkov** create a channel for Russian political leaders to influence Bulgarian government officials.

Bojkov is currently in Dubai, United Arab Emirates, where he successfully evaded Bulgarian extradition on a number of charges levied in 2020, including leading an organized crime group, coercion, attempted bribery of an official, and tax evasion. In its investigation, the Prosecutor's Office of the Republic of Bulgaria found that in February 2018, **Bojkov** paid the then-Chair of the SCG 10,000 Bulgarian Lev (approximately \$6,220) on a daily basis to revoke **Bojkov's** competitors' gambling licenses. Following this massive bribery scheme, the Chair of the SCG resigned, was arrested, and the SCG was abolished. There remains an international warrant for **Bojkov's** arrest as his influence continues in Bulgaria. In advance of the July 2021 Bulgarian parliamentary elections, **Bojkov** registered a political party that will run candidates in the aforementioned elections to target Bulgarian politicians and officials.

Bojkov is designated pursuant to E.O. 13818 for being a person who has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

OFAC is also designating 58 entities, including **Bulgarian Summer**, registered in Bulgaria that are owned or controlled by **Bojkov** or one of his companies:

- **Vabo-2005 EOOD, Digital Services EAD, Ede 2 EOOD, Nove Internal EOOD, Moststroy Iztok AD, Galenit Invest AD, Vabo 2008 EOOD, Vertex Properties EOOD, VB Management EOOD, Va Bo Company EOOD, Vabo Management EOOD, Vabo 2012 EOOD, Prim BG EAD, Eurogroup Engineering**
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EAD, Kristiano GR 53 JSC AD, Nove-AD-Holding AD, Bul Partners Travel OOD, Bullet Trade OOD, Caritex Lucky AD, Sizif V OOD, Thrace Foundation, Vabo Internal AD, and Bulgarian Summer are owned or controlled by Bojkov.

- **Rex Loto AD** is owned or controlled by **Vabo-2005 EOOD**.
- **Eurobet Partners OOD** is owned or controlled by **Digital Services EAD**.
- **Eurobet OOD** is owned or controlled by **Eurobet Partners OOD**.
- **Eurobet Trading EOOD** is owned or controlled by **Eurobet OOD**.
- **Vabo Systems EOOD, Vato 2002 EOOD, Nove Development EOOD, Property-VB OOD, Trans Nove OOD, Nove Partners OOD, Adler BG AD, Efbet Partners OOD, and Internews 98 OOD** are owned or controlled by **Nove Internal EOOD**.
- **Eurosadrushie OOD and Decart OOD** are owned or controlled by **Vabo Systems EOOD**.
- **Numerical Games OOD, Lottery Distributions OOD, National Lottery OOD, and Eurofootball OOD** are owned or controlled by **Eurosadrushie OOD**.
- **National Lottery AD** is owned or controlled by **Nove Development EOOD**.
- **Meliora Academica EOOD, Domino Games OOD, and ML Build EAD** are owned or controlled by **Decart OOD**.
- **Games Unlimited OOD** is owned or controlled by **VB Management EOOD**.
- **Evrobot - Rumania EOOD and Old Games EOOD** are owned or controlled by **Games Unlimited OOD**.
- **Vihrogonika AD** is owned or controlled by **Vabo Management EOOD**.
- **Vabo 2017 OOD and Lottery BG OOD** are owned or controlled by **Vabo 2012 EOOD**.
- **Siguro EOOD** is owned or controlled by **Eurogroup Engineering EAD**.
- **Trakia-Papir 96 OOD, Parkstroy-Sofia OOD, Publishing House Sport LTD, and CSKA Basketball Club** are owned or controlled by **Nove-AD-Holding AD**.
- **Ancient Heritage AD** is owned or controlled by **Thrace Foundation**.

DELYAN SLAVCHEV PEEVSKI AND HIS NETWORK

Delyan Slavchev Peevski (Peevski) is an oligarch who previously served as a Bulgarian MP and media mogul and has regularly engaged in corruption, using influence peddling and bribes to protect himself from public scrutiny and exert control over key institutions and sectors in Bulgarian society. In September 2019, **Peevski** actively worked to negatively influence the Bulgarian political process in the October 27, 2019 municipal elections. **Peevski** negotiated with politicians to provide them with political support and positive media coverage in return for receiving protection from criminal investigations.

Peevski also engaged in corruption through his front man **Ilko Dimitrov Zhelyazkov (Zhelyazkov)**, the former Deputy Chief of the Bulgarian State Agency for Technical Operations and former Bulgarian State Agency for National Security (DANS) officer who was appointed to the National Bureau for Control on Special Intelligence-Gathering Devices. **Peevski** used **Zhelyazkov** to conduct a bribery scheme involving

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Bulgarian residency documents for foreign persons, as well as to bribe government officials through various means in exchange for their information and loyalty. For example, as of 2019, **Zhelyazkov** was known for offering bribes to senior Bulgarian government officials who were expected to provide information to **Zhelyazkov** for onward passage to **Peevski**. In return, **Zhelyazkov** would see that individuals who accepted his offer were placed in positions of authority and also provided a monthly bribe. **Peevski** and **Zhelyazkov** also had an official placed in a leadership position to embezzle funds to them in 2019. In another example, as of early 2018, these two government officials ran a scheme to sell Bulgarian residency documents where company representatives purportedly paid bribes to Bulgarian officials to ensure their clients received citizenship documents immediately rather than making the \$500,000 deposit or waiting the five years for a legitimate request to be processed. Lastly, **Zhelyazkov** also blackmailed a potential Bulgarian government minister with criminal charges from Bulgaria's Prosecutor General's office if the minister did not provide him further assistance upon appointment.

Peevski and **Zhelyazkov** are designated pursuant to E.O. 13818 for being foreign persons who are current or former government officials, or persons acting for or on behalf of such an official, who are responsible for or complicit in, or who have directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

OFAC is also designating six entities registered in Bulgaria that are owned or controlled by **Peevski** or one of his companies:

- **Int Ltd EOOD** and **Intrust PLC EAD** are owned or controlled by **Peevski**.
- **BM Systems EAD**, **Int Invest EOOD**, **Inttrafik EOOD**, and **Real Estates Int Ltd EOOD** are owned or controlled by **Intrust PLC EAD**.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the persons above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. Unless authorized by a general or specific license issued by OFAC, or otherwise exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any blocked person or the receipt of any contribution or provision of funds, goods, or services from any such person.

GLOBAL MAGNITSKY

Building upon the Global Magnitsky Human Rights Accountability Act, E.O. 13818 was issued on December 20, 2017, in recognition that the prevalence of human rights abuse and corruption that have their source, in whole or in substantial part, outside the United States, had reached such scope and gravity as to threaten

GLOMAG-23653 0027

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the stability of international political and economic systems. Human rights abuse and corruption undermine the values that form an essential foundation of stable, secure, and functioning societies; have devastating impacts on individuals; weaken democratic institutions; degrade the rule of law; perpetuate violent conflicts; facilitate the activities of dangerous persons; and undermine economic markets. The United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons.

[Click here to view more information on today's designation.](#)

####

Evidentiary Memorandum Review Sheet

Name: **GLOMAG-19660**
Designation of Delyan Peevski **Non-Responsive**

Drafted: [REDACTED]
Sanctions Investigator
Human Rights & Anti-Corruption Section

Approved: [REDACTED] 04/29/2021
Section Chief
Human Rights & Anti-Corruption Section

[REDACTED] 05/24/2021
Assistant Director
Office of Global Targeting

Greg Gatjanis 05/25/2021
Associate Director
Office of Global Targeting

[REDACTED] 05/21/2021
Office of the Chief Counsel
(Foreign Assets Control)

Brad Smith 05/27/2021
Acting Director
Office of Foreign Assets Control

~~SECRET~~ [REDACTED]



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

OFFICE OF FOREIGN ASSETS CONTROL

(U) Case ID: GLOMAG-19960

(U) EVIDENTIARY MEMORANDUM

(U) MEMORANDUM FOR: Bradley T. Smith
Acting Director
Office of Foreign Assets Control

(U) THROUGH: Gregory T. Gatjanis
Associate Director
Office of Global Targeting

[REDACTED]
Assistant Director
Office of Global Targeting

(U) FROM: [REDACTED]
Section Chief
Human Rights and Anti-Corruption Section

[REDACTED]
Sanctions Investigator
Human Rights and Anti-Corruption Section

(U) SUBJECT: DELYAN SLAVCHEV PEEVSKI and Non-Responsive
Non-Responsive Designations Pursuant to Executive Order
13818 of December 20, 2017, "Blocking the Property of
Persons Involved in Serious Human Rights Abuse or
Corruption".

(U) I. INTRODUCTION

(U) On December 20, 2017, the President issued Executive Order 13818, "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption" ("E.O. 13818" or the "Order"). [Exhibit 1]

Classified By: [REDACTED]
Derived From: [REDACTED]
Declassify On: [REDACTED]

~~SECRET~~ [REDACTED]

~~SECRET~~ [REDACTED]

(U) The Order blocks the property and interests in property of any person determined by the Secretary of the Treasury, in consultation with the Secretary of State and Attorney General, to meet one or more of the criteria in the Order. [Exhibit 1]

(U) Information presented in this memorandum and the accompanying exhibits provides reason to believe that **DELYAN SLAVCHEV PEEVSKI** and **Non-Responsive** [REDACTED] are foreign persons who are current or former government officials, or persons acting for or on behalf of such an official, who are responsible for or complicit in, or have directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery, and therefore should be added to the list of Specially Designated Nationals and Blocked Persons ("SDN List").¹

(U) II. IDENTIFYING INFORMATION

- 1. (U) **DELYAN SLAVCHEV PEEVSKI (Individual)**
[Exhibit 13, p. 2]
- (U) АКА: Делян Славчев Пеевски [Exhibit 13, p. 2]
- (U) DOB: [REDACTED] [Exhibit 13, p. 1]
- (S) [REDACTED] POB: Sofia, Bulgaria [Exhibit 15, p. 1]
- (U) Nationality: Bulgaria [Exhibit 13, p. 1]
- (U) Gender: Male [Exhibit 13, p. 1]
- (S) [REDACTED] Passport: 383862880 (Bulgaria), Expiration date:
March 11, 2021 [Exhibit 14, p. 1]
- (S) [REDACTED] Location: 7 Nezabravka Street, Floor 7, Ap. 28, Sofia,
NA, 1113, Bulgaria [Exhibit 15, p. 1]

Non-Responsive [REDACTED]

¹ (U) The names of targets proposed for designation will appear in **BOLD CAPITAL** letters.

Non-Responsive [REDACTED]

~~SECRET~~ [REDACTED]

~~SECRET~~ [REDACTED]

(U) III. BASES FOR DETERMINATIONS

1. (U) DELYAN SLAVCHEV PEEVSKI (Individual) (PEEVSKI)

(U) PEEVSKI is a foreign person who is a current or former government official, or a person acting for or on behalf of such an official, who is responsible for or complicit in, or has directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

a. (U) PEEVSKI is a foreign person.

~~(S)~~ [REDACTED] [Exhibit 15, p. 1]

(U) According to a PeoplePill.com⁴ profile of PEEVSKI, accessed on October 5, 2020, PEEVSKI is from Bulgaria. [Exhibit 13, p. 1]

b. (U) PEEVSKI is a current or former government official.

~~(S)~~ [REDACTED] [Exhibit 11, pp. 2-3]

(U) According to the aforementioned PeoplePill.com profile of PEEVSKI, accessed on October 5, 2020, PEEVSKI serves as MP from the parliamentary group of the MRF in the 41st and 42nd Bulgarian National Assembly. [Exhibit 13, p. 2] OFAC assesses that PEEVSKI is still an active MP as OFAC is not aware of any documentation that says otherwise.

c. (U) PEEVSKI is responsible for or complicit in, or has directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

~~(S)~~ [REDACTED]

⁴ (U) PeoplePill.com describes itself as being owned and operated by Prong Media New York. PeoplePill.com publishes news and biographical information about people in the news. [Exhibit 16, p. 1]

⁵ (U) The Movement for Rights and Freedoms political party will be referenced as the "MRF" from this point forward in this memorandum.

~~SECRET~~ [REDACTED]

~~SECRET~~

[REDACTED]

[REDACTED]

(S)

[REDACTED]

[Exhibit 3, pp. 2-3]

(S)

[REDACTED]

[Exhibit 8, pp. 2-3]

(S)

[REDACTED]

~~SECRET~~

[REDACTED]

~~SECRET~~

[REDACTED]

[REDACTED]

[Exhibit 5, pp. 2-3]

(S) [REDACTED]

(S) [REDACTED]

(S)

[Exhibit 10, pp. 1-3]

(S) [REDACTED]

~~SECRET~~

[REDACTED]

~~SECRET~~

[REDACTED]

[REDACTED]

(S)

Exhibit 12, pp. 2-4]

(U) ADDITIONAL INFORMATION

[REDACTED]

~~SECRET~~

[REDACTED]

~~SECRET~~ [REDACTED]

[REDACTED]

[Exhibit 11, pp. 2-3]

Non-Responsive

[REDACTED]

[REDACTED]

[Exhibit 11, p. 2]

Non-Responsive

~~SECRET~~ [REDACTED]

~~SECRET~~ [REDACTED]

Non-Responsive



~~SECRET~~ [REDACTED]

~~SECRET~~

Non-Responsive



~~SECRET~~

~~SECRET~~ [REDACTED]

Non-Responsive



~~SECRET~~ [REDACTED]

~~SECRET~~

Non-Responsive



~~SECRET~~

~~SECRET~~ [Redacted]

(U) LIST OF EXHIBITS

(U) Exhibit 1: Executive Order 13818 of December 20 2017, "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption," 82 Fed. Reg. 60839 (December 26, 2017). (U)

(U) Exhibit 2: Non-Responsive [Redacted]

(U//~~FOUO~~) Exhibit 3: [Redacted] (S) [Redacted]

(U) Exhibit 4: Non-Responsive [Redacted]

(U//~~FOUO~~) Exhibit 5: [Redacted] (S) [Redacted]

(U//~~FOUO~~) Exhibit 6: Non-Responsive [Redacted]

(U//~~FOUO~~) Exhibit 7: [Redacted] (S) [Redacted]

(U//~~FOUO~~) Exhibit 8: Non-Responsive [Redacted]

(U//~~FOUO~~) Exhibit 9: [Redacted] (S) [Redacted]

(U//~~FOUO~~) Exhibit 10: [Redacted] (S) [Redacted]

(U//~~FOUO~~) Exhibit 11: [Redacted] (S) [Redacted]

(U//~~FOUO~~) Exhibit 12: [Redacted] (S) [Redacted]

(U) Exhibit 13: *PeoplePill.com*, "DELYAN PEEVSKI," accessed October 5, 2020. (U)

(U//~~FOUO~~) Exhibit 14: [Redacted] (S) [Redacted]

~~SECRET~~ [Redacted]

~~SECRET~~ [REDACTED]

(U/~~FOUO~~) Exhibit 15:

[REDACTED] (S) [REDACTED]

(U) Exhibit 16:

PeoplePill.com, "ABOUT PEOPLEPILL.COM," accessed December 18, 2020. (U)

(U) Exhibit 17:

Non-Responsive

~~SECRET~~ [REDACTED]



Presidential Documents

Executive Order 13818 of December 20, 2017

Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*) (NEA), the Global Magnitsky Human Rights Accountability Act (Public Law 114–328) (the “Act”), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)) (INA), and section 301 of title 3, United States Code,

I, DONALD J. TRUMP, President of the United States of America, find that the prevalence and severity of human rights abuse and corruption that have their source, in whole or in substantial part, outside the United States, such as those committed or directed by persons listed in the Annex to this order, have reached such scope and gravity that they threaten the stability of international political and economic systems. Human rights abuse and corruption undermine the values that form an essential foundation of stable, secure, and functioning societies; have devastating impacts on individuals; weaken democratic institutions; degrade the rule of law; perpetuate violent conflicts; facilitate the activities of dangerous persons; and undermine economic markets. The United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons.

I therefore determine that serious human rights abuse and corruption around the world constitute an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States, and I hereby declare a national emergency to deal with that threat.

I hereby determine and order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in:

(i) the persons listed in the Annex to this order;

(ii) any foreign person determined by the Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General:

(A) to be responsible for or complicit in, or to have directly or indirectly engaged in, serious human rights abuse;

(B) to be a current or former government official, or a person acting for or on behalf of such an official, who is responsible for or complicit in, or has directly or indirectly engaged in:

(1) corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery; or

(2) the transfer or the facilitation of the transfer of the proceeds of corruption;

(C) to be or have been a leader or official of:

EXHIBIT 1

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(1) an entity, including any government entity, that has engaged in, or whose members have engaged in, any of the activities described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section relating to the leader's or official's tenure; or

(2) an entity whose property and interests in property are blocked pursuant to this order as a result of activities related to the leader's or official's tenure; or

(D) to have attempted to engage in any of the activities described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section; and

(iii) any person determined by the Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General:

(A) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of:

(1) any activity described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section that is conducted by a foreign person;

(2) any person whose property and interests in property are blocked pursuant to this order; or

(3) any entity, including any government entity, that has engaged in, or whose members have engaged in, any of the activities described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section, where the activity is conducted by a foreign person;

(B) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order; or

(C) to have attempted to engage in any of the activities described in subsections (iii)(A) or (B) of this section.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted before the effective date of this order.

Sec. 2. The unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in section 1 of this order would be detrimental to the interests of the United States, and the entry of such persons into the United States, as immigrants or nonimmigrants, is hereby suspended. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the types of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order would seriously impair my ability to deal with the national emergency declared in this order, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 include:

(a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization; and

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in this order, there need be no prior notice of a listing or determination made pursuant to this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including adopting rules and regulations, and to employ all powers granted to me by IEEPA and the Act as may be necessary to implement this order and section 1263(a) of the Act with respect to the determinations provided for therein. The Secretary of the Treasury may, consistent with applicable law, redelegate any of these functions to other officers and agencies of the United States. All agencies shall take all appropriate measures within their authority to implement this order.

Sec. 9. The Secretary of State is hereby authorized to take such actions, including adopting rules and regulations, and to employ all powers granted to me by IEEPA, the INA, and the Act as may be necessary to carry out section 2 of this order and, in consultation with the Secretary of the Treasury, the reporting requirement in section 1264(a) of the Act with respect to the reports provided for in section 1264(b)(2) of that Act. The Secretary of State may, consistent with applicable law, redelegate any of these functions to other officers and agencies of the United States consistent with applicable law.

Sec. 10. The Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General, is hereby authorized to determine that circumstances no longer warrant the blocking of the property and interests in property of a person listed in the Annex to this order, and to take necessary action to give effect to that determination.

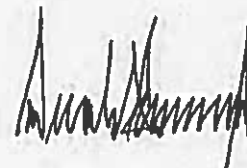
Sec. 11. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to submit recurring and final reports to the Congress on the national emergency declared in this order, consistent with section 401(c) of the NEA (50 U.S.C. 1641(c)) and section 204(c) of IEEPA (50 U.S.C. 1703(c)).

Sec. 12. This order is effective at 12:01 a.m., Eastern Standard Time, December 21, 2017.

EXHIBIT 1

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Sec. 13. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A handwritten signature in black ink, appearing to be "Donald Trump", located in the upper right quadrant of the page.

THE WHITE HOUSE,
December 20, 2017.

Billing code 3295-F8-P

ANNEX

1. Mukhtar Hamid Shah; Date of Birth (DOB) [REDACTED]
alt. DOB [REDACTED] nationality, Pakistan
2. Angel Rondon Rijo; DOB [REDACTED] nationality,
Dominican Republic
3. Dan Gertler; DOB [REDACTED] nationality, Israel;
alt. nationality, Democratic Republic of the Congo
4. Maung Maung Soe; DOB [REDACTED] nationality, Burma
5. Yahya Jammeh; DOB [REDACTED] nationality, The Gambia
6. Sergey Kusiuk; DOB [REDACTED] nationality,
Ukraine; alt. nationality, Russia
7. Benjamin Bol Mel; DOB [REDACTED] alt. DOB [REDACTED]
[REDACTED] nationality, South Sudan; alt. nationality,
Sudan
8. Julio Antonio Juárez Ramírez; DOB [REDACTED]
nationality, Guatemala
9. Goulнора Islamovna Karimova; DOB [REDACTED]
nationality, Uzbekistan
10. Slobodan Tesic; DOB [REDACTED] nationality,
Serbia
11. Artem Yuryevich Chayka; DOB [REDACTED]
nationality, Russia
12. Gao Yan; DOB [REDACTED] nationality, China
13. Roberto Jose Rivas Reyes; DOB [REDACTED] nationality,
Nicaragua

Exhibit 2 Withheld in Full
Non-Responsive

Bates: GLOMAG-23653 0048-0049

Exhibit 3 Withheld in Full

Bates: GLOMAG-23653 0050-0052

**Exhibit 4 Withheld in Full
Non-Responsive**

Bates: GLOMAG-23653 0053-0056

Exhibit 5 Withheld in Full

Bates: GLOMAG-23653 0057-0059

**Exhibit 6 Withheld in Full
Non-Responsive**

Bates: GLOMAG-23653 0060-0063

**Exhibit 7 Withheld in Full
Non-Responsive**

Bates: GLOMAG-23653 0064-0066

Exhibit 8 Withheld in Full

Bates: GLOMAG-23653 0067-0069

**Exhibit 9 Withheld in Full
Non-Responsive**

Bates: GLOMAG-23653 0070–0073

Exhibit 10 Withheld in Full

Bates: GLOMAG-23653 0074–0077

Exhibit 11 Withheld in Full

Bates: GLOMAG-23653 0078-0080

Exhibit 12 Withheld in Full

Bates: GLOMAG-23653 0081-0084

10/5/2020

About Delyan Peevski: Politician from Bulgaria (1980) | Biography, Facts, Career, Wiki, Life

EXHIBIT 13

PEOPLE PILL

STORIES LISTS BROWSE TRENDING

PEOPLE / DELYAN PEEVSKI

PEOPLEPII.COM

DELYAN PEEVSKI



POLITICIAN FROM BULGARIA

BIOGRAPHY LISTS NEWS ALSO VIEWED

THE BASICS

QUICK FACTS

Intro	Politician from Bulgaria
Is	Politician Lawyer
From	Bulgaria
Type	Law Politics
Gender	Male
Birth	[Redacted] Sofia
Age	40 years
Family	Mother: Irena Krastewa Spouse: Cvetelina Yaneva

THE DETAILS

BIOGRAPHY

10/6/2020

About Delyan Peevski: Politician from Bulgaria (1980) | Biography, Facts, Career, Wiki, Life Reader Mode

EXHIBIT 13

A

About Delyan Peevski: Politician from Bulgaria (1980-) | Biography, Facts, Career, Wiki, Life

The details

Biography

Delyan Slavchev Peevski (Bulgarian: Делян Славчев Пеевски) (born [REDACTED]) is a Bulgarian lawyer, entrepreneur, media mogul and politician. He serves as MP from the parliamentary group of the DPS in the 41st and 42nd National Assembly. Along with his mother, Irena Krasteva, Peevski owns print and TV media outlets. The official owner of such is only Krasteva, who is also co-owner of the largest printing company in Bulgaria - IPK "Rodina". Peevski graduated from 119 SOU in Sofia in 1998 and completed his legal studies at the South-West University in 2003. According to Radio Bulgaria in March 2016, Peevski is "the undisputed media mogul of Bulgaria." He owns more than 20 newspapers, TV channels, radio stations and magazines.

Political career

In 2001, Peevski joined the National Movement Simeon II (NMSII). He has been a member of DPS since 2009. In 2007, he was fired as a deputy minister during the Socialist-led government in a corruption scandal. He was investigated, but the investigation was dropped and he was given his job back.

In June 2013, Peevski was elected President of the State Agency for National Security, with the votes of 116 MPs. Thousands of Bulgarians gathered in front of government headquarters in Sofia to protest Peevski's appointment, chanting "Mafia" and "resign." Under the pressure of the protests against the Oresharski cabinet that followed, Parliament unanimously revised its decision later the same month. The case became widely known in the entire European Union.

After a couple of months of lack of clarity whether under these conditions Peevski was still considered an MP or not, eventually in December 2013 the Constitutional Court decided that he still was an MP.

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About Delyan Peevski: Politician from Bulgaria (1980) | Biography, Facts, Career, Wiki, Life Reader Mode

EXHIBIT 13

In May 2014, Peevski was elected to the European Parliament on the MRF ticket, but immediately thereafter decided to give up his seat. He explained that his motivation to participate in the European elections, while not taking his seat, had been to restore his reputation.

In mid June 2014, three people were arrested due to their involvement in an alleged murder plot against Peevski, but they were eventually released because of a lack of sufficient evidence. The Bulgarian prosecution service arrested innocent men and put them on TV, presenting them as people hired by Corpbank owner Tzvetan Vassilev. On the same day that the three innocent men were paraded on Bulgarian TV as supposed murderers hired by Vassilev, the Bulgarian prosecutor's office raided offices affiliated with Corporate Commercial Bank, the fourth largest bank and one of the most successful banks in Bulgaria.

Role in Corporate Commercial Bank closure

In June 2014, a panic caused a run on Corporate Commercial Bank ("CorpBank") in Bulgaria. According to *Politico*, the panic "appears to have been triggered when Delyan Peevski ... pulled out massive amounts of money from Corporate Commercial Bank." The run resulted in the bank being taken over by the Bulgaria National Bank (the country's central bank). At the time media reports said that the bank's closing was due to a dispute between bank owner Tzvetan Vassilev and Peevski. Vassilev told a *Forbes* reporter, "Delyan Peevski is simply one of the main tools that the Bulgarian political mafia uses to blackmail Bulgarian business—the visible part of a rather large iceberg of corruption." By the visible part, Vassilev was referring to Peevski's media empire and Peevski's ability to use media assets such as newspapers and TV stations to create negative public opinion about the bank. Vassilev said that the political mafia had tried to "downgrade what happened to Corpbank to a personal conflict between Mr. Peevski and me, which is utterly untrue."

"The claim that I had tried to organize Mr. Peevski's murder was subsequently disproved in court, but it was too late—more than 20% of CorpBank's assets were withdrawn in cash in the span of 4 days," Vassilev said.

The run on CorpBank coincided with a run on another bank, First Investment Bank ("FI Bank"). Media reports and social media messages helped cause the run on both banks. However, the Bulgaria National Bank shut down CorpBank while keeping FI Bank open with emergency liquidity. According to Nikolay Staykov of the Bulgarian Protest Network, CorpBank was brought down by the government in order to remove Vassilev, while the government protected FI Bank—the bank that Peevski moved his money into. "But

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About Delyan Peevski: Politician from Bulgaria (1980) | Biography, Facts, Career, Wiki, Life Reader Mode

EXHIBIT 13

as this whole affair is really a fight to the death between Vassilev and Peevski, it is hard not to conclude that Bulgarian institutions are partisan." The Bulgarian judicial system and prosecutor's office are known to be corrupt and partisan, according to *Forbes*.

"The removal of Vassilev from the scene leaves Peevski in effective control not only of Bulgarian media and secret services, but of its banking sector too. Such concentration of power is a cause for concern in a supposedly democratic country."

Media and business empire

Protests of business relationship with government

In the summer of 2013, tens of thousands of Bulgarians protested daily in the streets demanding the resignation of the entire government due to questions about public trust. Peevski's short lived appointment as head of the national security agency was just one issue the protesters were angry about. A larger issue was the government's reliance on "Mr. Peevski's media group for survival," according to *The Economist*.

Size and scope

As of 2013, Peevski's media empire controlled six of the 12 largest circulating newspapers. It also had a monopoly on newspaper distribution and digital TV channels. By 2016, the number of newspapers he owned increased to more than 20.

In 2016, he also owned several construction companies and was the owner of Bulgartabac, the biggest manufacturer and seller of tobacco and related products. "The Turkish Financial Crime Investigation Board (MASAK) and the Turkish Ministry of Customs and Trade on their part accused Bulgartabac of being one of the biggest cigarette smuggling entities in Turkey and of being closely allied to the banned Kurdistan Workers' Party, the PKK, which is on the European list of terrorist organizations," according to Radio Bulgaria.

Downfall

In early 2016, Peevski published a letter to the media where he said he would no longer start any new business projects in Bulgaria. He said his decision was due to an "ongoing 'smear' campaign" and political pressure.

In an analysis, Radio Bulgaria said it was difficult to pinpoint why Peevski was downsizing his business empire. However, they wrote:

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About Delyan Peevski: Politician from Bulgaria (1980-) | Biography, Facts, Career, Wiki, Life - Reader Mode

EXHIBIT 13

"Still, some analysts say there is a connection between the shocks tearing across the Peevski conglomerate and the bankruptcy, two years ago, of the Corporate Commercial Bank with majority owner, Peevski's own former business partner and friend Tsvetan Vasilev. There is ample evidence that it was precisely the crediting from that bank that helped Delyan Peevski build his media empire, stone by stone, an empire that has been putting out tentacles into many other economic sectors and spheres. But the cheap (free?) financing is now gone and the media market is not particularly lucrative."

The contents of this page are sourced from [Wikipedia article](#). The contents are available under the [CC BY-SA 4.0 license](#).

Spotted a mistake? Let us know.

Add some information about Delyan Peevski

Defamatory or malevolent submissions will be removed

Add an image to Delyan Peevski 's image gallery



Exhibit 14 Withheld in Full
Bates: GLOMAG-23653 0090

Exhibit 15 Withheld in Full

Bates: GLOMAG-23653 0091-0092

12/18/2020

About peoplepill.com

EXHIBIT 16



STORIES LISTS BROWSE TRENDING

PAGE LAST UPDATED ON 01/01/2020

ABOUT PEOPLEPILL.COM

What is peoplepill.com?

Peoplepill.com, owned and operated by Prong Media New York, publishes news and biographical information about people in the news.

Why can't I edit an existing profile?

We do not allow users to edit an existing profile to prevent vandalism.

How are the "trending people" determined?

The list of trending people is based on the number of views on a profile page and signals from Twitter, Facebook, Google and Bing.

How are "people also viewed these people" determined?

The list is based on aggregated user click behavior, search behavior, and on a person's family connections, work relationships, explicit attributes such as work type, age, etc.

How can I contact you?

Please use the contact form on [Contact](#) page.



**Exhibit 17 Withheld in Full
Non-Responsive**

Bates: GLOMAG-23653 0094-0098

Evidentiary Memorandum Review Sheet

Name: GLOMAG-19961
Designation of Delyan Peevski Derivatives

Drafted: [Redacted]
Sanctions Investigator
Human Rights and Corruption Section

Approved: [Redacted]
Acting Section Chief
Human Rights and Anti-Corruption Section

Electronically Cleared
on 05/05/2021

[Redacted]
Assistant Director
Office of Global Targeting

Electronically Cleared
on 05/25/2021

Ripley Quinby
Acting Associate Director
Office of Global Targeting

Electronically Cleared
on 05/11/2021

[Redacted]
Office of Chief Counsel

Brad Smith
Deputy Director
Office of Foreign Assets Control

Electronically Cleared
on 05/25/2021



UNCLASSIFIED

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

(U) Case ID: GLOMAG-19961

OFFICE OF FOREIGN ASSETS CONTROL

EVIDENTIARY MEMORANDUM

(U) MEMORANDUM FOR: Bradley Smith
Acting Director
Office of Foreign Assets Control

(U) THROUGH: Ripley Quinby
Acting Deputy Associate Director
Office of Global Targeting

[REDACTED]
Assistant Director
Office of Global Targeting

(U) FROM: [REDACTED]
Section Chief
Human Rights and Anti-Corruption Section

[REDACTED]
Sanctions Investigator
Human Rights and Anti-Corruption Section

(U) SUBJECT: INT LTD EOOD, INTRUST PLC EAD, BM SYSTEMS EAD,
INT INVEST EOOD, INTTRAFIK EOOD, and REAL
ESTATES INT LTD EOOD: Designations Pursuant to Executive
Order 13818 of December 20, 2017, "Blocking the Property of
Persons Involved in Serious Human Rights Abuse or Corruption."

(U) I. INTRODUCTION

(U) On December 20, 2017, the President issued Executive Order 13818, "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption," ("E.O. 13818" or the "Order"). [Exhibit 1]

(U) The Order blocks the property and interests in property of any person determined by the Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General, to meet one or more of the criteria in the Order. [Exhibit 1, pp. 1-2]

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(U) Information presented in this memorandum and the accompanying exhibits provides reason to believe that **INT LTD EOOD** and **INTRUST PLC EAD** are owned or controlled by, or have acted or purported to act for or on behalf of, directly or indirectly, **Delyan Peevski (Peevski)**,¹ a person proposed for concurrent designation pursuant to the Order, and therefore should be added to the list of Specially Designated Nationals and Blocked Persons (“SDN List”).²

(U) Information presented in this memorandum and the accompanying exhibits provides reason to believe that **BM SYSTEMS EAD**, **INT INVEST EOOD**, **INTTRAFIK EOOD**, and **REAL ESTATES INT LTD EOOD** are owned or controlled by, or have acted or purported to act for or on behalf of, directly or indirectly, **INTRUST PLC EAD**, an entity proposed for concurrent designation pursuant to the Order, and therefore should be added to the SDN List.

(U) II. IDENTIFYING INFORMATION

1. (U) **INT LTD EOOD (Entity)** [Exhibit 2, p. 1]
 - (U) Address: 119 Ul. Ekzarh Yosif Str., R-N Oborishte Distr, Sofia, Bulgaria 1527 [Exhibit 3, p. 1]
 - (U) Address: 79, Ralevitsa Str., Vitosha Distr., Sofia, 1618, Stolichna, Bulgaria [Exhibit 15, p. 1]
 - (U) V.A.T./Tax Register Number: BG204589523 (Bulgaria) [Exhibit 2, p. 4]
 - (U) Established Date: 2017 [Exhibit 2, p. 1]
2. (U) **INTRUST PLC EAD (Entity)** [Exhibit 4, p. 1]
 - (U) AKA: Intrust EAD [Exhibit 6, p. 1]
 - (U) Address: 119 Ekzarh Yosif Str./blvd., R-N Oborishte Distr, Sofia, Bulgaria 1527 [Exhibit 5, p. 1]
 - (U) Address: 79, Ralevitsa Str., Vitosha Distr., Sofia, 1618, Stolichna, Bulgaria [Exhibit 16, p. 1]
 - (U) Trade Register Number: 204589733 (Bulgaria) [Exhibit 4, p. 4]
 - (U) Company ID: 485100GBI2SE0KIX8T70 [Exhibit 4, p. 4]
 - (U) Established Date: 2017 [Exhibit 4, p. 1]
3. (U) **BM SYSTEMS EAD (Entity)** [Exhibit 7, p. 1]
 - (U) Address: 119 Ekzarh Yosif Str./blvd., Oborishte Distr., Sofia, Bulgaria 1527 [Exhibit 8, p. 1]
 - (U) Trade Register Number: 131382912 (Bulgaria) [Exhibit 7, p. 4]
 - (U) Established Date: 2007 [Exhibit 7, p. 1]
4. (U) **INT INVEST EOOD (Entity)** [Exhibit 9, p. 1]
 - (U) Address: 119 Ekzarh Yosif Str./blvd., Oborishte Distr., Sofia, Bulgaria 1527 [Exhibit 10, p. 1]
 - (U) Address: 79, Ralevitsa Str./blvd., Vitosha Distr., Sofia, 1618, Stolichna, Bulgaria [Exhibit 21, p. 1]

¹ (U) Peevski is proposed for concurrent designation in evidentiary memorandum GLOMAG-19960.

² (U) The name of the targets proposed for designation will appear in **BOLD CAPITAL** letters, and the name of the target proposed for concurrent designation will appear in **bold sentence case** letters.

UNCLASSIFIED

- (U) V.A.T./Tax Register Number: BG205535941 (Bulgaria) [Exhibit 9, p. 2]
 (U) Established Date: 2019 [Exhibit 9, p. 1]
5. (U) **INTTRAFIK EOOD (Entity)** [Exhibit 11, p. 1]
 (U) AKA: Intrtraffic EOOD [Exhibit 12, p. 1]
 (U) Address: 119 Ekzarh Yosif Str., Oborishte Distr., Sofia, Bulgaria 1527 [Exhibit 12, p. 1]
 (U) Address: 102, Balcrgaria blvd., Vitosha Distr., Apt. 59, Sofia, 1618, Stolichna, Bulgaria [Exhibit 19, p. 1]
 (U) V.A.T./Tax Register Number: BG205244843 (Bulgaria) [Exhibit 11, p. 4]
 (U) Established Date: 2018 [Exhibit 11, p. 1]
6. (U) **REAL ESTATES INT LTD EOOD (Entity)** [Exhibit 13, p. 1]
 (U) Address: 119 Ul. Ekzarh Yosif str., R-N Oborishte Distr., Sofia, Bulgaria 1527 [Exhibit 14, p. 1]
 (U) Address: 79, Ralevitsa Str., Vitosha Distr., Sofia, 1618, Stolichna, Bulgaria [Exhibit 20, p. 1]
 (U) V.A.T./Tax Register Number: BG204930572 (Bulgaria) [Exhibit 13, p. 3]
 (U) Established Date: 2018 [Exhibit 13, p. 1]

(U) III. **BASES FOR DETERMINATIONS**1. (U) **INT LTD EOOD (Entity) (ILE)**

(U) *ILE is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, Peevski, an individual concurrently proposed for designation pursuant to the Order.*

(U) According to a Bureau van Dijk Orbis³ (Orbis) profile of ILE accessed on December 14, 2020, with information updated as of November 2020, ILE is involved in the buying and selling of real estate. [Exhibit 2, p. 3] According to the profile, Peevski is the beneficial owner, ultimate owner, and 100 percent shareholder of ILE. The profile states the company has no other ultimate beneficial owners. [Exhibit 2, pp. 25–26]⁴

³ (U) Orbis describes itself as the world's most powerful comparable data resource on private companies with information on more than 375 million companies across the globe. [Exhibit 17, p. 9]

⁴ (U) According to the aforementioned Orbis profile of ILE accessed on December 14, 2020, with information updated as of November 2020, the definition of an ultimate owner is the path from the company to its ultimate owner is minimum 50.01 percent. Orbis considers a company the ultimate owner if there are no identified shareholders or if the shareholder percentage is not known. [Exhibit 2, p. 25] According to the same profile, the definition of a beneficial owner is the minimum percentage of ownership at first level is 10.00 percent, the minimum percentage at further levels is 50.01 percent. Orbis also considers any individual at the top of a path who has an unknown percentage of ownership. Orbis also considers any individual at the top of a path who has a percentage of minimum 10.00 percent (with the requested 50.01 percent at all other levels). Beneficial owners from register are not subject to the defined thresholds. [Exhibit 2, p. 26]

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(U) [REDACTED] **Business Confidential** [REDACTED]⁵
 p. 3] Exhibit 3,

(U) OFAC assesses that the Peevski referenced in exhibits 2 and 3 is the Peevski being proposed for concurrent designation on the basis of a three-part name match, "Delyan Slavchev Peevski", in both instances.

2. (U) INTRUST PLC EAD (Entity) (IPE)

(U) *IPE is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, Peevski, an individual concurrently proposed for designation pursuant to the Order.*

(U) According to an Orbis profile of IPE accessed on December 14, 2020, with information updated as of November 2020, IPE is involved in the buying and selling of real estate. [Exhibit 4, p. 3] According to the profile, Peevski is the beneficial owner and 100 percent shareholder of IPE. [Exhibit 4, pp. 27–28]

(U) [REDACTED] **Business Confidential** [REDACTED]
 [Exhibit 5, p. 3]

(U) According to a December 15, 2020 *SeeNews*⁶ profile on IPE, with information updated as of February 6, 2020, Peevski⁷ owns 100 percent of IPE. [Exhibit 6, p. 4]

(U) OFAC assesses that the Peevski referenced in exhibits 4 and 5 is the Peevski being proposed for concurrent designation on the basis of a three-part name match, "Delyan Slavchev Peevski", in both instances. OFAC additionally assesses that the Peevski referenced in Exhibit 6 is also the Peevski being proposed for concurrent designation though the name listed is "Delian Slavchev Peevski" on the basis of a two-part name match and corresponding ownership documents in exhibits 4 and 5 showing Peevski's ownership under correct spelling.

3. (U) BM SYSTEMS EAD (Entity) (BSE)

(U) *BSE is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, IPE, an entity concurrently proposed for designation pursuant to the Order.*

(U) According to an Orbis profile of BSE accessed on December 14, 2020, with information updated as of November 2020, BSE is involved in other business support service activities. [Exhibit 7, p. 3] According to the same profile, IPE owns 100 percent, and is the 100 percent shareholder, of BSE. [Exhibit 7, pp. 27–28]

⁵ (U) D&B GRS for Government describes itself as a platform that allows analysts to gain access to the D&B Data Cloud, the world's most comprehensive business data and analytics. [Exhibit 18, p. 1]

⁶ (U) *SeeNews* describes itself as the complete guide to the emerging economies of Southeast Europe with the latest news, market intelligence, industry analyses, and on-demand research. [Exhibit 6, p. 6]

⁷ (U) Exhibit 6 misspells Peevski as "Delian Slavchev Peevski." [Exhibit 6, p. 4]

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(U) [REDACTED] Business Confidential

[Exhibit 8, p. 1]

4. (U) INT INVEST EOOD (Entity) (IE)

(U) IE is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, IPE, an entity concurrently proposed for designation pursuant to the Order.

(U) [REDACTED] Business Confidential

[Exhibit 10, p. 1]

[Exhibit 10, p. 3]

(U) According to an Orbis profile of IE accessed on December 14, 2020, with information updated as of December 11, 2020, IPE owns 100 percent, and is the 100 percent shareholder, of IE. [Exhibit 9, p. 11]

5. (U) INTTRAFIK EOOD (Entity) (IE)

(U) IE is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, IPE, an entity concurrently proposed for designation pursuant to the Order.

(U) According to an Orbis profile of IE accessed on December 14, 2020, with information updated as of November 2020, IE is involved in business services. [Exhibit 11, p. 3] According to the same profile, IPE owns 100 percent, and is the 100 percent shareholder, of IE. [Exhibit 11, p. 27]

(U) [REDACTED] Business Confidential

[Exhibit 12, p. 3]

6. (U) REAL ESTATES INT LTD EOOD (Entity) (REILE)

(U) REILE is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, IPE, an entity concurrently proposed for designation pursuant to the Order.

(U) According to an Orbis profile of REILE accessed on December 14, 2020, with information updated as of November 2020, REILE is involved in buying and selling of own real estate. [Exhibit 13, p. 2] According to the same profile, IPE owns 100 percent, and is the 100 percent shareholder, of REILE. [Exhibit 13, p. 26]

(U) [REDACTED] Business Confidential

[Exhibit 14, p. 3]

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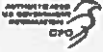
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(U) LIST OF EXHIBITS

- (U) Exhibit 1: Executive Order 13818 of December 20, 2017, "Blocking the Property of People Involved in Serious Human Rights Abuse or Corruption," 82 Fed. Reg. 60839 (December 26, 2017). (U)
- (U) Exhibit 2: Orbis, INT LTD EOOD, BvD ID BG204589523, available at <https://orbis.bvdinfo.com/>, accessed December 14, 2020. (U)
- (U) Exhibit 3: Dun & Bradstreet, INT LTD EOOD, DUNS #50-754-6529, accessed December 15, 2020. (U)
- (U) Exhibit 4: Orbis, INTRUST PLC EAD, BvD ID BG204589733, available at <https://orbis.bvdinfo.com/>, accessed December 14, 2020. (U)
- (U) Exhibit 5: Dun & Bradstreet, INTRUST PLC EAD, DUNS #50-754-6555, accessed December 15, 2020. (U)
- (U) Exhibit 6: *SeeNews.com*, "Intrust EAD," accessed on December 15, 2020, available at https://seenews.com/companies/company_profile/intrust-ead-613464#ownership. (U)
- (U) Exhibit 7: Orbis, BM SYSTEMS EAD, BvD ID BG131382912, available at <https://orbis.bvdinfo.com/>, accessed December 14, 2020. (U)
- (U) Exhibit 8: Dun & Bradstreet, BM SYSTEMS EAD, DUNS #67-306-3954, accessed December 14, 2020. (U)
- (U) Exhibit 9: Orbis, INT INVEST EOOD, BvD ID BG205535941, available at <https://orbis.bvdinfo.com/>, accessed December 14, 2020. (U)
- (U) Exhibit 10: Dun & Bradstreet, INT INVEST EOOD, DUNS #52-441-4553, accessed December 15, 2020. (U)
- (U) Exhibit 11: Orbis, INTTRAFIK EOOD, BvD ID BG205244843, available at <https://orbis.bvdinfo.com/>, accessed December 14, 2020. (U)
- (U) Exhibit 12: Dun & Bradstreet, INTTRAFFIC EOOD, DUNS #52-437-5632, accessed December 15, 2020. (U)
- (U) Exhibit 13: Orbis, REAL ESTATES INT LTD EOOD, BvD ID BG204930572, available at <https://orbis.bvdinfo.com/>, accessed December 14, 2020. (U)
- (U) Exhibit 14: Dun & Bradstreet, REAL ESTATES INT LTD EOOD, DUNS #50-758-8914, accessed December 15, 2020. (U)
- (U) Exhibit 15: Dun & Bradstreet, INT LTD EOOD, DUNS #50-754-6529, accessed December 21, 2020. (U)
- (U) Exhibit 16: Dun & Bradstreet, INTRUST PLC EAD, DUNS #50-754-6555, accessed December 21, 2020. (U)

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- (U) Exhibit 17: Orbis, "Private company information – Orbis," available at <https://www.bvdinfo.com/en-us/>. (U)
- (U) Exhibit 18: Dun & Bradstreet, "Global Reference Solution for Government," available at <https://www.dnb.com/products/government/grs.html>. (U)
- (U) Exhibit 19: Dun & Bradstreet, INTTRAFFIC EOOD, DUNS #52-437-5632, accessed December 21, 2020. (U)
- (U) Exhibit 20: Dun & Bradstreet, REAL ESTATES INT LTD EOOD, DUNS #50-758-8914, accessed December 21, 2020. (U)
- (U) Exhibit 21: Dun & Bradstreet, INT INVEST EOOD, DUNS #52-441-4553, accessed December 21, 2020. (U)



Presidential Documents

Executive Order 13818 of December 20, 2017

Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*) (NEA), the Global Magnitsky Human Rights Accountability Act (Public Law 114–328) (the “Act”), section 212(f) of the Immigration and Nationality Act of 1952 (8 U.S.C. 1182(f)) (INA), and section 301 of title 3, United States Code,

I, DONALD J. TRUMP, President of the United States of America, find that the prevalence and severity of human rights abuse and corruption that have their source, in whole or in substantial part, outside the United States, such as those committed or directed by persons listed in the Annex to this order, have reached such scope and gravity that they threaten the stability of international political and economic systems. Human rights abuse and corruption undermine the values that form an essential foundation of stable, secure, and functioning societies; have devastating impacts on individuals; weaken democratic institutions; degrade the rule of law; perpetuate violent conflicts; facilitate the activities of dangerous persons; and undermine economic markets. The United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons.

I therefore determine that serious human rights abuse and corruption around the world constitute an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States, and I hereby declare a national emergency to deal with that threat.

I hereby determine and order:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in:

(i) the persons listed in the Annex to this order;

(ii) any foreign person determined by the Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General:

(A) to be responsible for or complicit in, or to have directly or indirectly engaged in, serious human rights abuse;

(B) to be a current or former government official, or a person acting for or on behalf of such an official, who is responsible for or complicit in, or has directly or indirectly engaged in:

(1) corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery; or

(2) the transfer or the facilitation of the transfer of the proceeds of corruption;

(C) to be or have been a leader or official of:

EXHIBIT 1

60840 Federal Register / Vol. 82, No. 246 / Tuesday, December 26, 2017 / Presidential Documents

(1) an entity, including any government entity, that has engaged in, or whose members have engaged in, any of the activities described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section relating to the leader's or official's tenure; or

(2) an entity whose property and interests in property are blocked pursuant to this order as a result of activities related to the leader's or official's tenure; or

(D) to have attempted to engage in any of the activities described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section; and

(iii) any person determined by the Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General:

(A) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of:

(1) any activity described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section that is conducted by a foreign person;

(2) any person whose property and interests in property are blocked pursuant to this order; or

(3) any entity, including any government entity, that has engaged in, or whose members have engaged in, any of the activities described in subsections (ii)(A), (ii)(B)(1), or (ii)(B)(2) of this section, where the activity is conducted by a foreign person;

(B) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order; or

(C) to have attempted to engage in any of the activities described in subsections (iii)(A) or (B) of this section.

(b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted before the effective date of this order.

Sec. 2. The unrestricted immigrant and nonimmigrant entry into the United States of aliens determined to meet one or more of the criteria in section 1 of this order would be detrimental to the interests of the United States, and the entry of such persons into the United States, as immigrants or nonimmigrants, is hereby suspended. Such persons shall be treated as persons covered by section 1 of Proclamation 8693 of July 24, 2011 (Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions).

Sec. 3. I hereby determine that the making of donations of the types of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order would seriously impair my ability to deal with the national emergency declared in this order, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 4. The prohibitions in section 1 include:

(a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 5. (a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. For the purposes of this order:

EXHIBIT 1

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(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization; and

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States.

Sec. 7. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in this order, there need be no prior notice of a listing or determination made pursuant to this order.

Sec. 8. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including adopting rules and regulations, and to employ all powers granted to me by IEEPA and the Act as may be necessary to implement this order and section 1263(a) of the Act with respect to the determinations provided for therein. The Secretary of the Treasury may, consistent with applicable law, redelegate any of these functions to other officers and agencies of the United States. All agencies shall take all appropriate measures within their authority to implement this order.

Sec. 9. The Secretary of State is hereby authorized to take such actions, including adopting rules and regulations, and to employ all powers granted to me by IEEPA, the INA, and the Act as may be necessary to carry out section 2 of this order and, in consultation with the Secretary of the Treasury, the reporting requirement in section 1264(a) of the Act with respect to the reports provided for in section 1264(b)(2) of that Act. The Secretary of State may, consistent with applicable law, redelegate any of these functions to other officers and agencies of the United States consistent with applicable law.

Sec. 10. The Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General, is hereby authorized to determine that circumstances no longer warrant the blocking of the property and interests in property of a person listed in the Annex to this order, and to take necessary action to give effect to that determination.

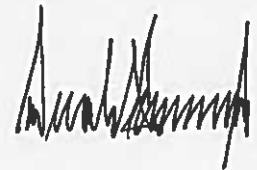
Sec. 11. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to submit recurring and final reports to the Congress on the national emergency declared in this order, consistent with section 401(c) of the NEA (50 U.S.C. 1641(c)) and section 204(c) of IEEPA (50 U.S.C. 1703(c)).

Sec. 12. This order is effective at 12:01 a.m., Eastern Standard Time, December 21, 2017.

EXHIBIT 1

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Sec. 13. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A handwritten signature in black ink, appearing to be "Donald Trump", located to the right of the main text.

THE WHITE HOUSE,
December 20, 2017.

Billing code 3295-F8-P

ANNEX

1. Mukhtar Hamid Shah; Date of Birth (DOB) [REDACTED]
alt. DOB [REDACTED] nationality, Pakistan
2. Angel Rondon Rijo; DOB [REDACTED] nationality,
Dominican Republic
3. Dan Gertler; DOB [REDACTED] nationality, Israel;
alt. nationality, Democratic Republic of the Congo
4. Maung Maung Soe; DOB [REDACTED] nationality, Burma
5. Yahya Jammeh; DOB [REDACTED] nationality, The Gambia
6. Sergey Kusiuk; DOB [REDACTED] nationality,
Ukraine; alt. nationality, Russia
7. Benjamin Bol Mel; DOB [REDACTED] alt. DOB [REDACTED]
[REDACTED] nationality, South Sudan; alt. nationality,
Sudan
8. Julio Antonio Juárez Ramírez; DOB [REDACTED]
nationality, Guatemala
9. Goulнора Islamovna Karimova; DOB [REDACTED]
nationality, Uzbekistan
10. Slobodan Tesic; DOB [REDACTED] nationality,
Serbia
11. Artem Yuryevich Chayka; DOB [REDACTED]
nationality, Russia
12. Gao Yan; DOB [REDACTED] nationality, China
13. Roberto Jose Rivas Reyes; DOB [REDACTED] nationality,
Nicaragua

[FR Doc. 2017-27925

Filed 12-22-17; 8:45 am]

Billing code 3295-F8-C

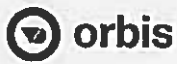


EXHIBIT 2



INT LTD EOOD

SOFIA, Bulgaria

Active

Private

BvD ID n° BG204589523

The Global Ultimate Owner of this controlled subsidiary is MR DELYAN SLAVCHEV PEEVSKI

Key information

UL. EKZARH YOSIF, 119 1527 SOFIA Bulgaria	Activity: Corporate, Property Services Date of incorporation: 2017
---	---

Turnover for 2019 \$ 0.00 =
--

Net income for 2019 \$ -6.89 th ↘ -96%

Ownership 1 shareholder 0 subsidiary 10 companies in the corporate group
--

PEPs and sanctions ▶ There are names that are the same, or similar to, a risk relevant name



EXHIBIT 2

Financial profile

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
Operating revenue (Turnover)	0 =	0	n.a.
P/L before tax	-6,893 ↘	-3,512	n.a.
P/L for period [=Net income]	-6,893 ↘	-3,512	n.a.
Cash flow	-5,744	n.a.	n.a.
Total assets	564,618 ↘	583,070 ↘	653,054
Shareholders funds	564,044 ↘	581,899 ↘	613,196
Current ratio (x)	n.s.	n.s.	16.29
ROE using P/L before tax (%)	-1.22 ↘	-0.60	n.a.
Solvency ratio (Asset based) (%)	99.90 ↗	99.80 ↗	93.90

Management

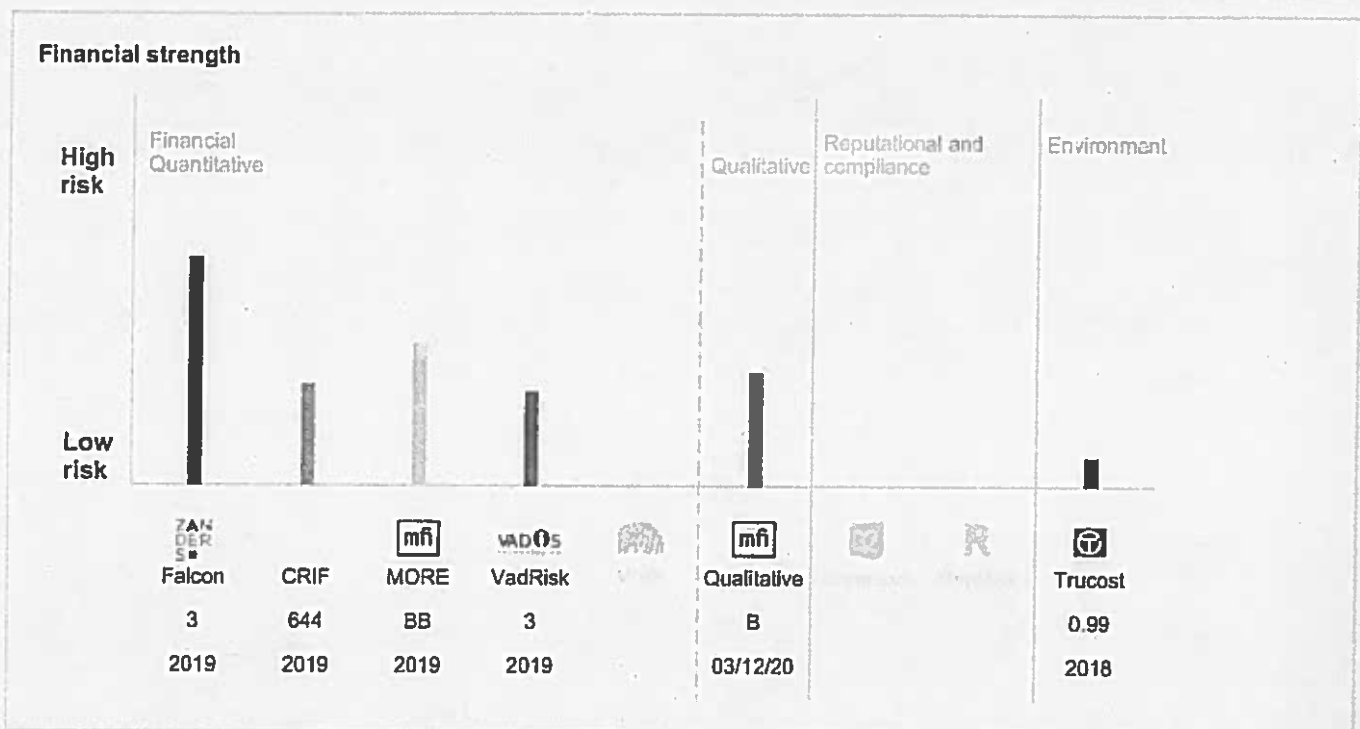
Mr Aleksandar Kirilov Georgiev

News stories since last year

0 negative stories
0 stories in total



EXHIBIT 2



Contact

Contact information

UL. EKZARH YOSIF, 119
1527 SOFIA
Bulgaria

Oblast

Sofia City

NUTS1

BG4 - Southwestern and South-Central Bulgaria

NUTS2

BG41 - Yugozapaden

NUTS3

BG412 - Sofia City

Industry & activities

Type of entity: Corporate
BvD sector: Property Services
NACE Rev. 2 main section: L - Real estate activities

NACE Rev. 2 code(s)

Core code: 6810 Buying and selling of own real estate
Primary code(s): 6810 Buying and selling of own real estate

NAICS 2017 code(s) {derived from NACE Rev. 2 codes}

Core code: 5312 Offices of Real Estate Agents and Brokers
Primary code(s): 531210 Offices of Real Estate Agents and Brokers

US SIC code(s) {derived from NACE Rev. 2 codes}

Core code: 653 Real estate agents and managers
Primary code(s): 6531 Real estate agents and managers



EXHIBIT 2

Identifiers

BvD ID number	BG204589523
BvD account number	BG204589523U
BvD9 number	319529068
UIC (Trade register number)	204589523
European VAT number	BG204589523
TIN (TIN)	204589523

Legal information

Active(updated in Orbis on 24/05/2017)

One-person private limited company - EOOD
Incorporated in 2017
Corporate

PEPs and sanctions

▶ There are names that are the same, or similar to, a risk relevant name

Accounting information

Information for this record is provided by Creditreform Bulgaria (last delivery: 29/11/2020)

Most recent accounts: 2019
Available in Orbis since 06/2020
Types of account: Unconsolidated
Available for: 3 years

Accounts published in: BGN
Closing date: 31/12/2019
Filing type: Local registry filing
Accounting template: Corporate

Available account

31/12/2019 Unconsolidated, Local registry filing

Key indicators based on Unconsolidated, Local registry filing

Turnover for 2019

\$ 0.00 =

Legal events

Date	Type	Description	Source
01/06/2017	Registration	VAT registration	Registry Agency (BULSTAT register)



EXHIBIT 2

Date	Type	Description	Source
12/05/2017	Registration	Founded as EOOD (one person private ltd. co.)	Registry Agency (BULSTAT register)

Key financials & employees

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Operating revenue (Turnover)	0	0	n.a.
L P/L before tax	-6,893	-3,512	n.a.
L P/L for period [=Net income]	-6,893	-3,512	n.a.
L Cash flow	-5,744	n.a.	n.a.
L Total assets	564,618	583,070	653,054
L Shareholders funds	564,044	581,899	613,196
L Current ratio (x)	n.s.	n.s.	16.29
L Profit margin (%)	n.s.	n.s.	n.a.
L ROE using P/L before tax (%)	-1.22	-0.60	n.a.
L ROCE using P/L before tax (%)	n.a.	n.a.	n.a.
L Solvency ratio (Asset based) (%)	99.90	99.80	93.90
L Number of employees	n.a.	n.a.	n.a.

Global standard format

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320

Balance sheet

Assets

Fixed assets	490,523	442,571	3,679
--------------	---------	---------	-------



EXHIBIT 2

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Intangible fixed assets	0	0	0
L Tangible fixed assets	433,084	442,571	3,679
L Other fixed assets	57,438	0	0
Current assets	74,095	140,499	649,375
L Stock	0	0	0
L Debtors	0	0	245,892
L Other current assets	74,095	140,499	403,483
L Cash & cash equivalent	74,095	101,276	401,643
Total assets	564,618	583,070	653,054

Liabilities & equity

Shareholders funds	564,044	581,899	613,196
L Capital	574,383	585,412	613,196
L Other shareholders funds	-10,339	-3,512	0
Non-current liabilities	0	0	0
L Long term debt	0	0	0
L Other non-current liabilities	0	0	0
L Provisions	0	0	0
Current liabilities	574	1,171	39,858
L Loans	0	0	0
L Creditors	574	1,171	0
L Other current liabilities	0	0	39,858
Total shareh. funds & liab.	564,618	583,070	653,054

Memo lines

L Working capital	-74,095	-101,276	-401,643
L Net current assets	73,521	139,328	609,517
L Enterprise value	n.a.	n.a.	n.a.



EXHIBIT 2

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Number of employees	n.a.	n.a.	n.a.

Profit & loss account

L Operating revenue (Turnover)	0	0	n.a.
L Sales	0	0	n.a.
L Costs of goods sold	n.a.	n.a.	n.a.
L Gross profit	n.a.	n.a.	n.a.
L Other operating expenses	n.a.	n.a.	n.a.
L Operating P/L [=EBIT]	-9,765	-3,512	n.a.
L Financial P/L	2,872	0	n.a.
L Financial revenue	2,872	0	n.a.
L Financial expenses	0	0	n.a.
L P/L before tax	-6,893	-3,512	n.a.
L Taxation	0	0	n.a.
L P/L after tax	-6,893	-3,512	n.a.
L Extr. and other P/L	0	0	n.a.
L Extr. and other revenue	0	0	n.a.
L Extr. and other expenses	0	0	n.a.
L P/L for period [=Net income]	-6,893	-3,512	n.a.

Memo lines

L Export revenue	n.a.	n.a.	n.a.
L Material costs	574	n.a.	n.a.
L Costs of employees	n.a.	n.a.	n.a.
L Depreciation & Amortization	1,149	n.a.	n.a.
L Other operating items	8,041	3,512	n.a.
L Interest paid	n.a.	n.a.	n.a.



EXHIBIT 2

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Research & Development expenses	n.a.	n.a.	n.a.
L Cash flow	-5,744	n.a.	n.a.
L Added value	n.a.	n.a.	n.a.
L EBITDA	n.a.	n.a.	n.a.

Global ratios

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320

Profitability ratios

L ROE using P/L before tax (%)	-1.22	-0.60	n.a.
L ROCE using P/L before tax (%)	n.a.	n.a.	n.a.
L ROA using P/L before tax (%)	-1.22	-0.60	n.a.
L ROE using Net income (%)	-1.22	-0.60	n.a.
L ROCE using Net income (%)	n.a.	n.a.	n.a.
L ROA using Net income (%)	-1.22	-0.60	n.a.
L Profit margin (%)	n.s.	n.s.	n.a.
L Gross margin (%)	n.a.	n.a.	n.a.
L EBITDA margin (%)	n.a.	n.a.	n.a.
L EBIT margin (%)	n.s.	n.s.	n.a.
L Cash flow / Operating revenue (%)	n.s.	n.a.	n.a.
L Enterprise value / EBITDA (x)	n.a.	n.a.	n.a.
L Market cap / Cash flow from operations (x)	n.a.	n.a.	n.a.



EXHIBIT 2

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320

Operational ratios

L Net assets turnover (x)	n.s.	n.s.	n.a.
L Interest cover (x)	n.a.	n.a.	n.a.
L Stock turnover (x)	n.s.	n.s.	n.a.
L Collection period (days)	n.s.	n.s.	n.a.
L Credit period (days)	n.s.	n.s.	n.a.
L Export revenue / Operating revenue (%)	n.a.	n.a.	n.a.
L R&D expenses / Operating revenue (%)	n.a.	n.a.	n.a.

Structure ratios

L Current ratio (x)	n.s.	n.s.	16.29
L Liquidity ratio (x)	n.s.	n.s.	16.29
L Shareholders liquidity ratio (x)	n.s.	n.s.	n.s.
L Solvency ratio (Asset based) (%)	99.90	99.80	93.90
L Solvency ratio (Liability based) (%)	n.s.	n.s.	n.s.
L Gearing (%)	0.00	0.00	0.00

Per employee ratios

L Profit per employee (th)	n.a.	n.a.	n.a.
L Operating revenue per employee (th)	n.a.	n.a.	n.a.
L Costs of employees / Operating revenue (%)	n.a.	n.a.	n.a.
L Average cost of employee (th)	n.a.	n.a.	n.a.
L Shareholders funds per employee (th)	n.a.	n.a.	n.a.
L Working capital per employee (th)	n.a.	n.a.	n.a.



EXHIBIT 2

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Total assets per employee (th)	n.a.	n.a.	n.a.

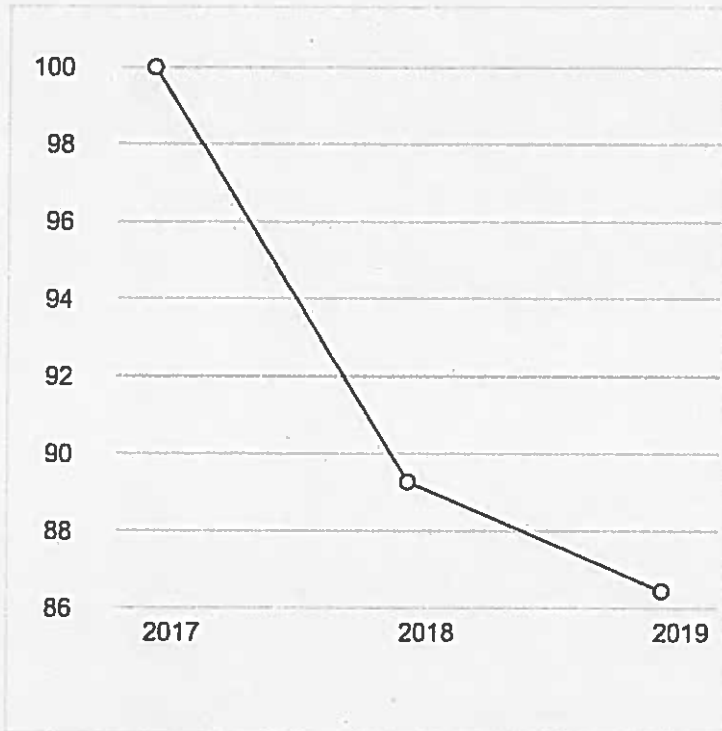
Graph - Value over time



Graph - Indices of several values over time



EXHIBIT 2



Base: 2017

● Total assets (th USD)

653

Peer comparison

Accounting year: Peer group year	Year	Operating revenue (Turnover) th USD		P/L before tax th USD	
Median		0		-1	
Standard deviation		0		3	
Average		0		-3	

NIZAR INVEST 11 EOOD	2019	0	1	0	1
MIRVAN INVEST 11 EOOD	2019	0	1	-1	3
REZIDENS FAYV EOOD	2019	0	1	-9	11
VITOSHA VIEW 6 LTD OOD	2019	0	1	-3	7
BAYA INVEST EOOD	2019	0	1	0	1
YUG STROY 1 OOD	2019	0	1	-1	3
SI INDUSTRIAL EOOD	2019	0	1	-1	5
IMOT 414 LTD EOOD	2019	0	1	-1	5
CRAMCO LTD EOOD	2019	0	1	-7	9
BAN 2017 LTD EOOD	2019	0	1	-3	7
INT LTD EOOD	2019	0	1	-7	9





EXHIBIT 2

Accounting year: Peer group year	Year	P/L for period [=Net income] th USD		Total assets th USD	
Median		-1		358	
Standard deviation		3		543	
Average		-3		476	

NIZAR INVEST 11 EOOD	2019	0	1	36	11
MIRVAN INVEST 11 EOOD	2019	-1	3	240	7
REZIDENS FAYV EOOD	2019	-9	11	410	5
VITOSHA VIEW 6 LTD OOD	2019	-3	7	434	4
BAYA INVEST EOOD	2019	0	1	358	6
YUG STROY 1 OOD	2019	-1	3	2,079	1
SI INDUSTRIAL EOOD	2019	-1	5	693	2
IMOT 414 LTD EOOD	2019	-1	5	147	9
CRAMCO LTD EOOD	2019	-7	9	191	8
BAN 2017 LTD EOOD	2019	-3	7	83	10
INT LTD EOOD	2019	-7	9	565	3

Accounting year: Peer group year	Year	Shareholders funds th USD		Number of employees	
Median		68		1	
Standard deviation		175		0	
Average		122		1	

NIZAR INVEST 11 EOOD	2019	0	7	1	1
MIRVAN INVEST 11 EOOD	2019	-2	8	1	1
REZIDENS FAYV EOOD	2019	68	6	1	1
VITOSHA VIEW 6 LTD OOD	2019	-8	9	n.a.	
BAYA INVEST EOOD	2019	337	2	n.a.	
YUG STROY 1 OOD	2019	-14	10	n.a.	
SI INDUSTRIAL EOOD	2019	187	3	n.a.	
IMOT 414 LTD EOOD	2019	146	4	n.a.	
CRAMCO LTD EOOD	2019	-15	11	1	1
BAN 2017 LTD EOOD	2019	83	5	1	1
INT LTD EOOD	2019	564	1	n.a.	

Peer group definition

Closest 10 international companies according to the Operating revenue (Turnover) of the subject company for the last available year (2019) amongst the standard peer group.

The standard peer group is based on NACE Rev. 2 industry classification: 6810 - Buying and selling of own real estate.

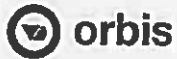


EXHIBIT 2

Company ratings

No data available for this company

Country ratings

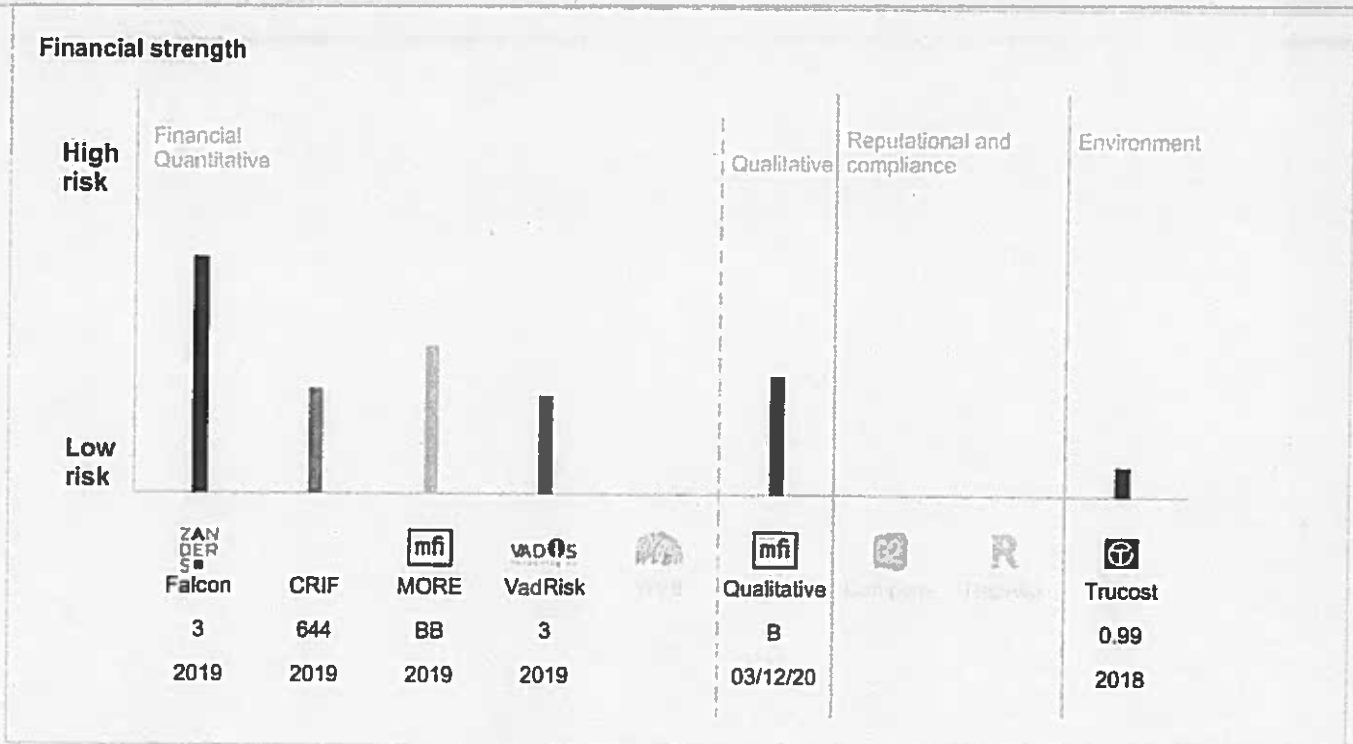
Your subscription does not include some of the agency ratings.

EIU

	Rating	Date	Action/Direction	Outlook	Watch
Overall country rating	BBB	01/09/2020			
Banking sector rating	BB	01/09/2020		Stable	

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Financial strength summary



Falcon counterparty risk score by Zanders



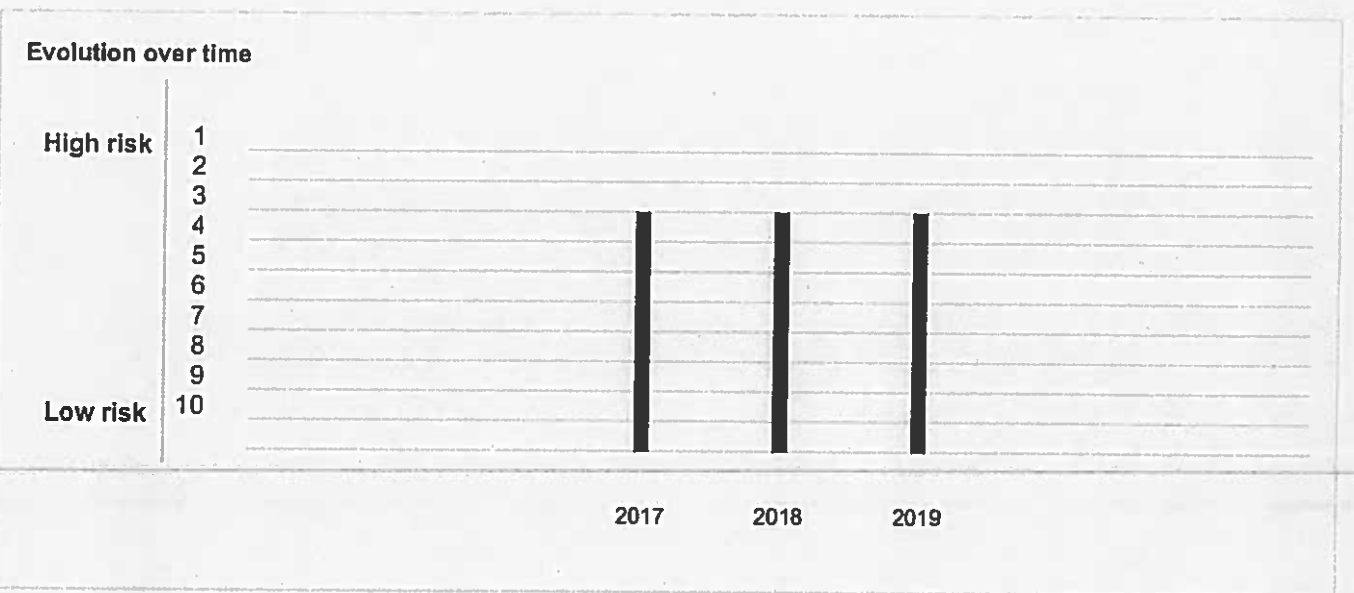
EXHIBIT 2

3 - Weak
for 2019

Probability of default: 2.75%

Credit limit: 3,370 \$

Industry: Real estate activities



Evolution over time (Tabular view)

	2017	2018	2019
Counterparty Risk Score (CRS)	3	3	3
Probability of default (%)	2.75	2.75	2.75
Falcon credit limit (\$)	2,399	2,290	3,370

Observations

- 2019 Original currency is not EUR
The credit limit could not consider Turnover figures.
- 2018 Original currency is not EUR
The credit limit could not consider Turnover figures.
- 2017 Original currency is not EUR
The credit limit could not consider Turnover figures.

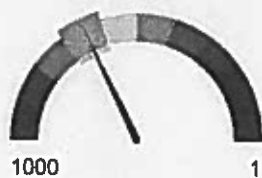


EXHIBIT 2

Falcon influencing ratios

	2017	2018	2019
Operations and Liquidity			
Turnover growth	2	2	0
Return on sales	2	0	0
Current ratio	9	10	10
Debtor days	2	0	0
Debt services			
Interest coverage ratio	2	2	2
Debt/EBITDA	2	2	2
Capital structure			
Gearing		7	7
Solvency	10	10	10
Tangible net worth	2	2	2

Financial stability score by CRIF Decision Solutions Ltd



644
for 2019

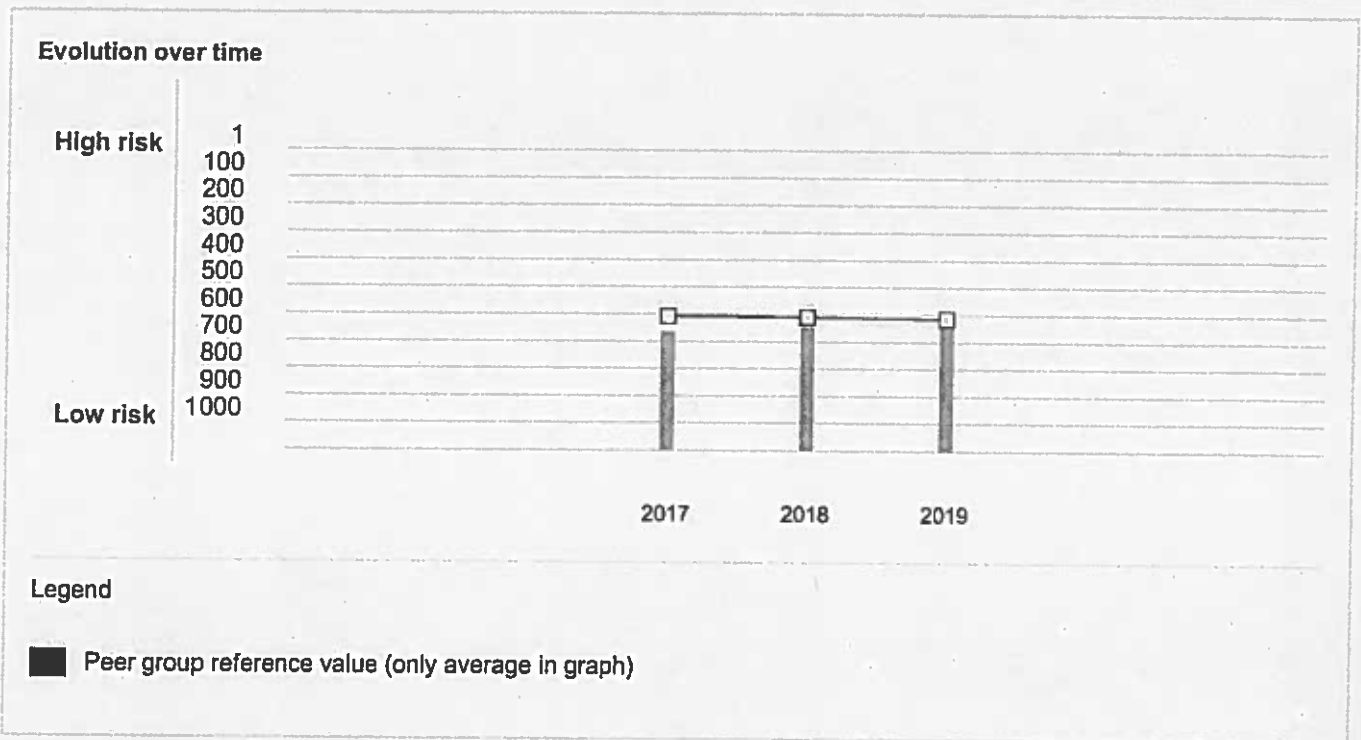
Key influencing factors - Profitability
- Asset management efficiency

Scores for peer group 245 Minimum
608 Average
824 Maximum

Industry Buying and selling of own real estate



EXHIBIT 2



Evolution over time (Tabular view)

	2017	2018	2019
Company	663	644	644
Key factors	- Profitability - Asset management efficiency	- Profitability - Asset management efficiency	- Profitability - Asset management efficiency
Peer group			
Minimum	245	265	250
Average	608	609	614
Maximum	824	834	834

MORE credit risk score by modeFinance

BB - Adequate

for 2019

Confidence level: 75%

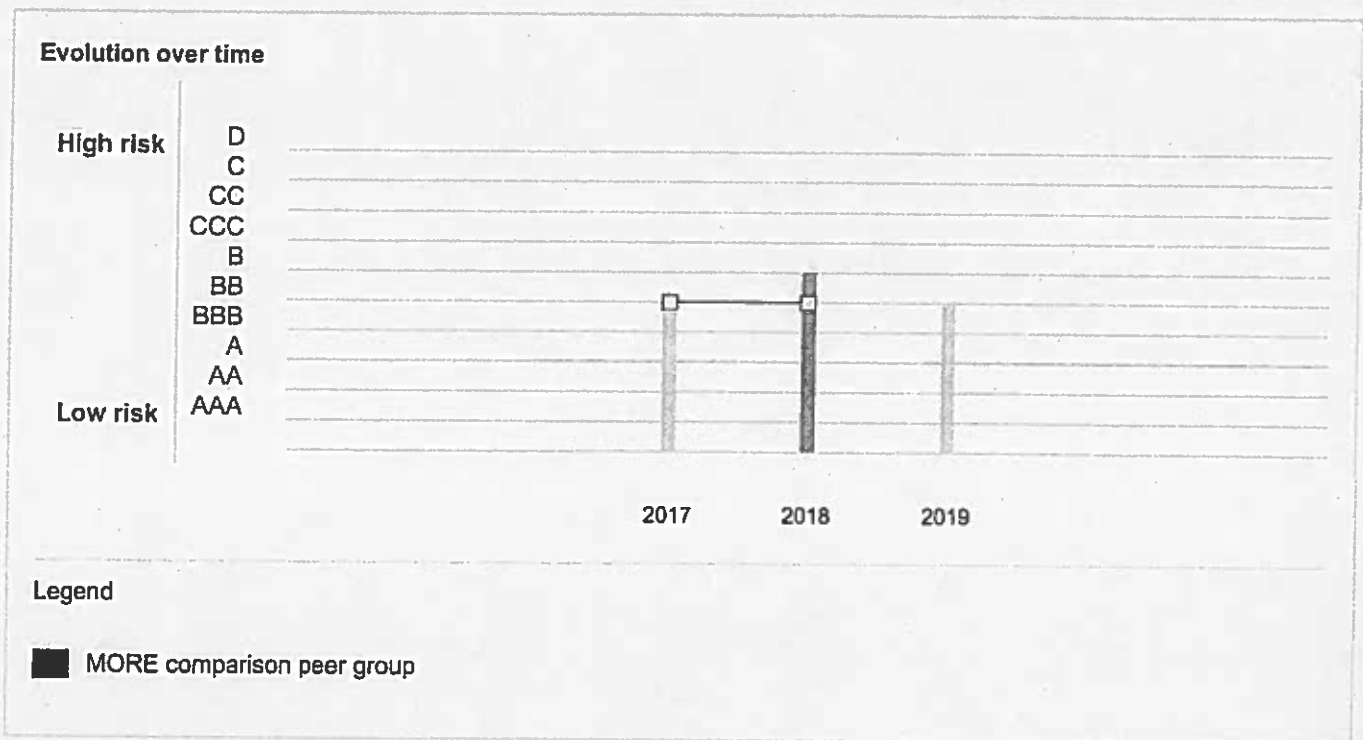
Probability of default: 2.50%

Credit limit: 23,591 \$

Industry: Holding



EXHIBIT 2



Evolution over time (Tabular view)

	2017	2018	2019
Score			
Company	BB	B	BB
Peer group	BB	BB	n.a.
Probability of default (%)			
Company	2.50	4.80	2.50
Peer group	2.10	1.90	n.a.
Confidence level (%)			
Company	52	86	75
Credit limit (\$)			
Company	34,779.62	2,900.02	3,591.40



EXHIBIT 2

MORE influencing ratios

	2017	2018	2019
Solvency ratios			
Leverage ratio	AAA	AAA	AAA
Assets to debt	AAA	AAA	AAA
Financial ratio			
Fixed assets coverage ratio			BBB
Liquidity ratios			
Current ratio	BBB	BBB	
Quick ratio	BBB	BBB	
Cash conversion cycle (CCC)	C	C	
Profitability and economic ratios			
Return on investment (ROI)		CC	CC
Return on equity (ROE)		CC	CC
Asset turnover		D	
Interest coverage ratio			
Interest paid coverage		D	

Predictive Indicators by Vadis

Propensity of bankruptcy



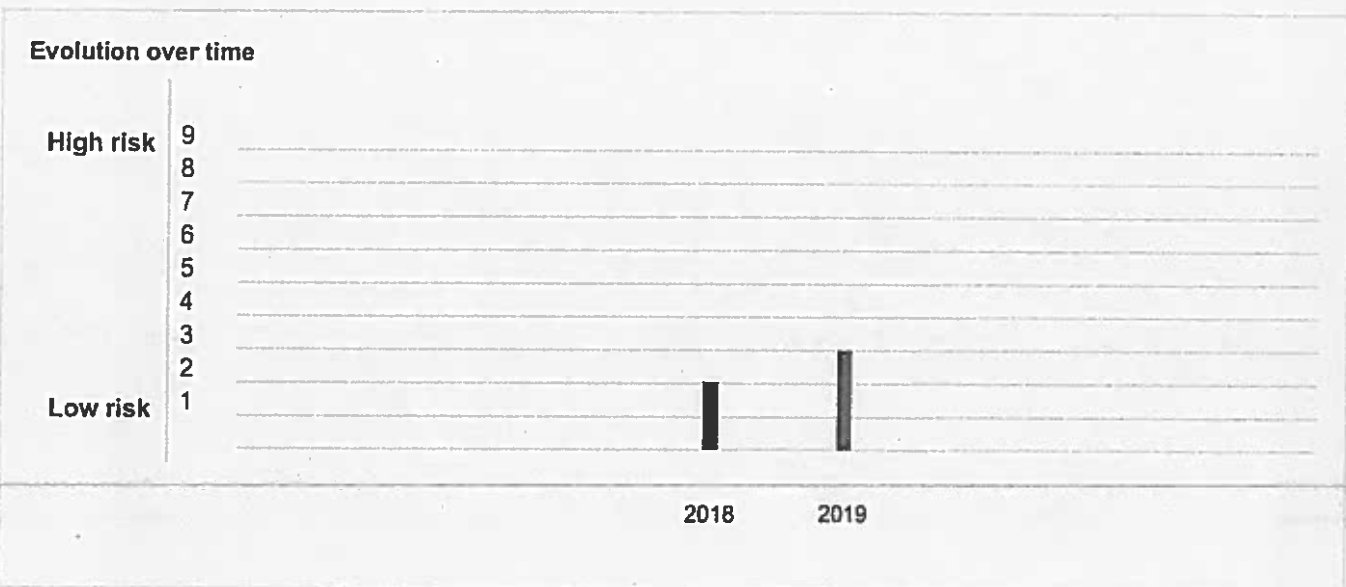
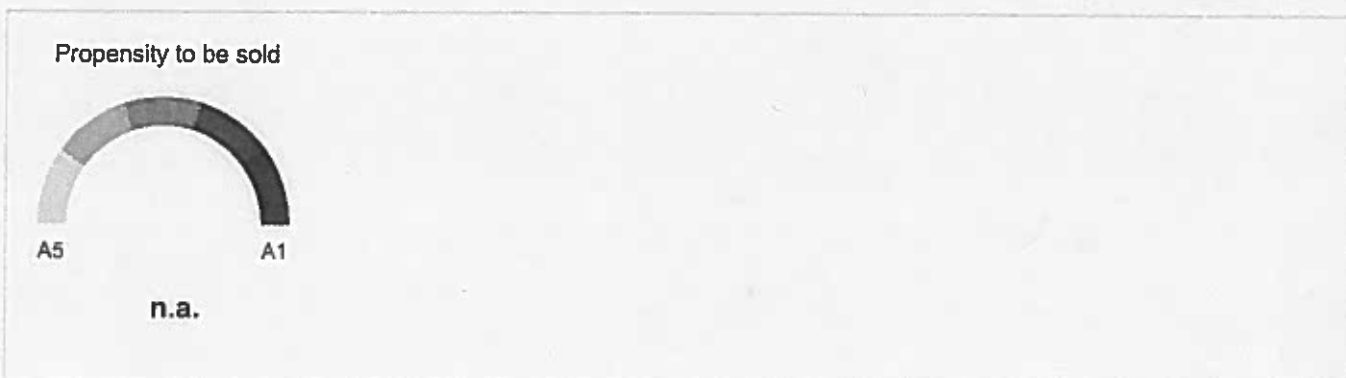
Risk of bankruptcy lower than national average
for 2019

Key influencing factors:

- + Evolution of costs of goods sold
- + Evolution of current ratio
- + Company's ownership key performance indicators
- + Evolution of loans (company's sector financials)
- Evolution of other current liabilities



EXHIBIT 2




Evolution over time (Tabular view)

	2018	2019
Propensity of bankruptcy	2	3
Key influencing factors	<ul style="list-style-type: none"> + Evolution of loans / current liabilities + Evolution of costs of goods sold + Evolution of current ratio + Company's ownership key performance indicators + Evolution of loans (company's sector financials) 	<ul style="list-style-type: none"> + Evolution of costs of goods sold + Evolution of current ratio + Company's ownership key performance indicators + Evolution of loans (company's sector financials) - Evolution of other current liabilities

Qualitative score by modeFinance



EXHIBIT 2



B - Satisfactory
on 03/12/2020

Confidence level: 55.0%

Credit limit: n.a.
No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.

Key influencing factors: B - GUO MORE score / status
D - Directors average MORE score / status
D - Size of the GUO

Industry score: D

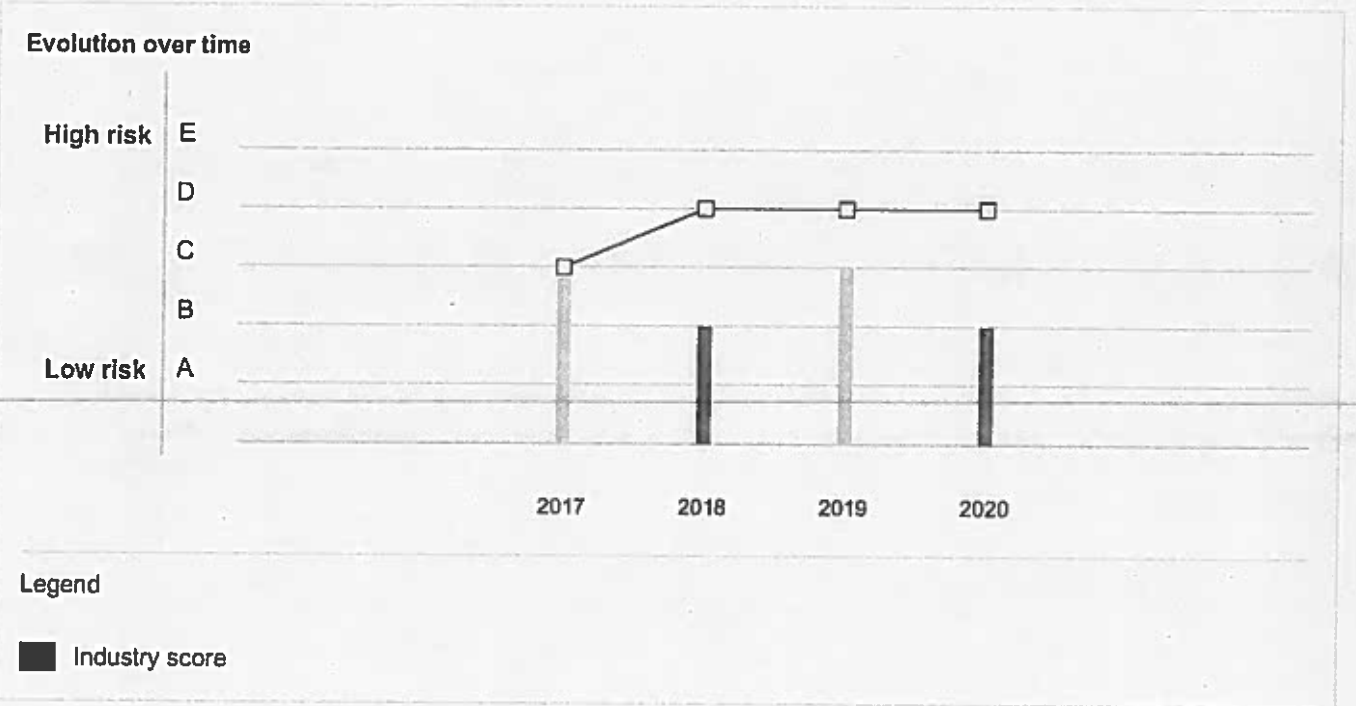




EXHIBIT 2

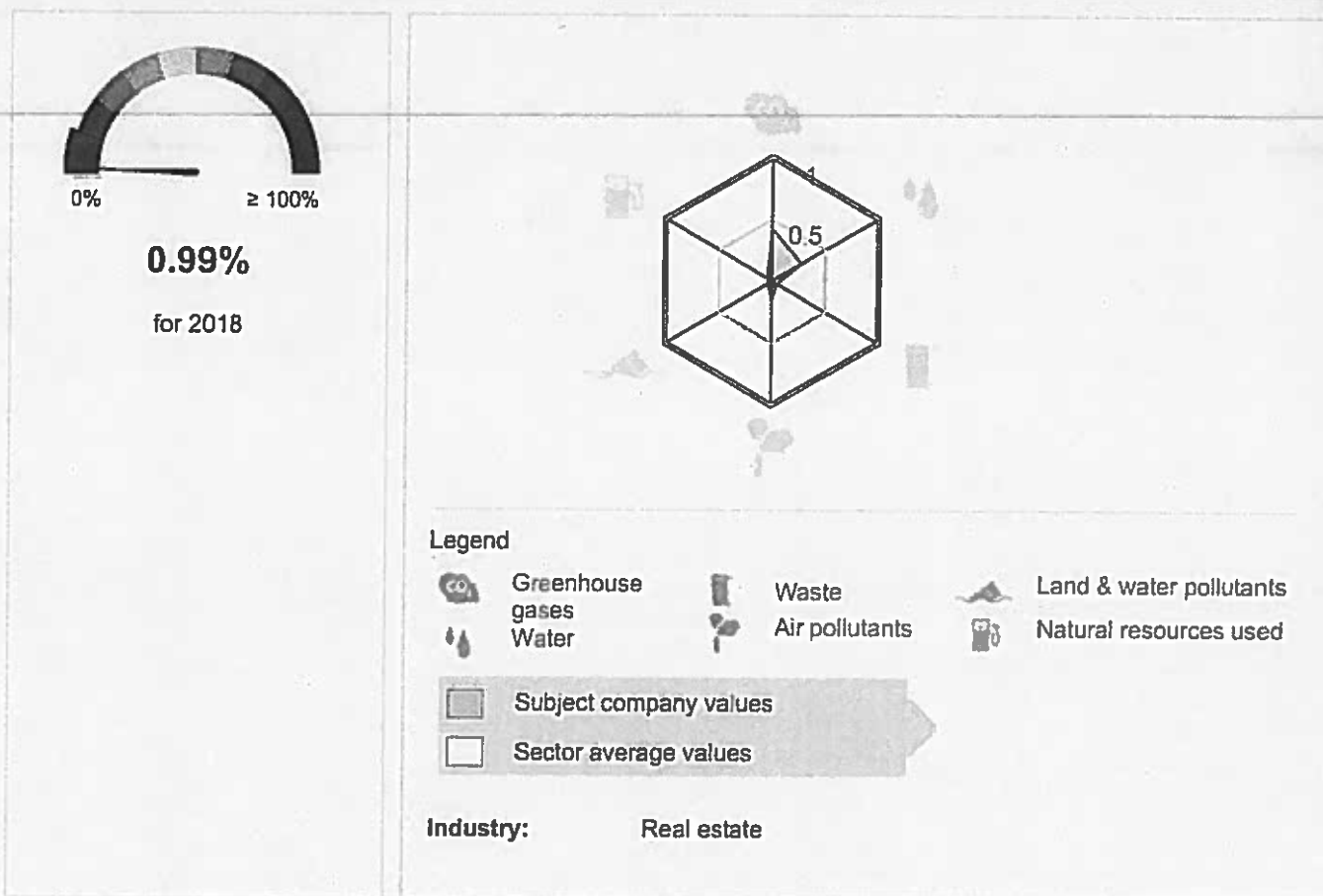
Evolution over time (Tabular view)

	2017	2018	2019	03/12/2020
Qualitative score	C	B	C	B
Confidence level (%)	11	49	55	55
Credit limit	n.a.	n.a.	n.a.	n.a.
Industry score	C	D	D	D

Credit limit annotations

- 03/12/2020** No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
- 2019** No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
- 2018** No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
- 2017** No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.

Environmental score by Trucost



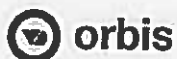
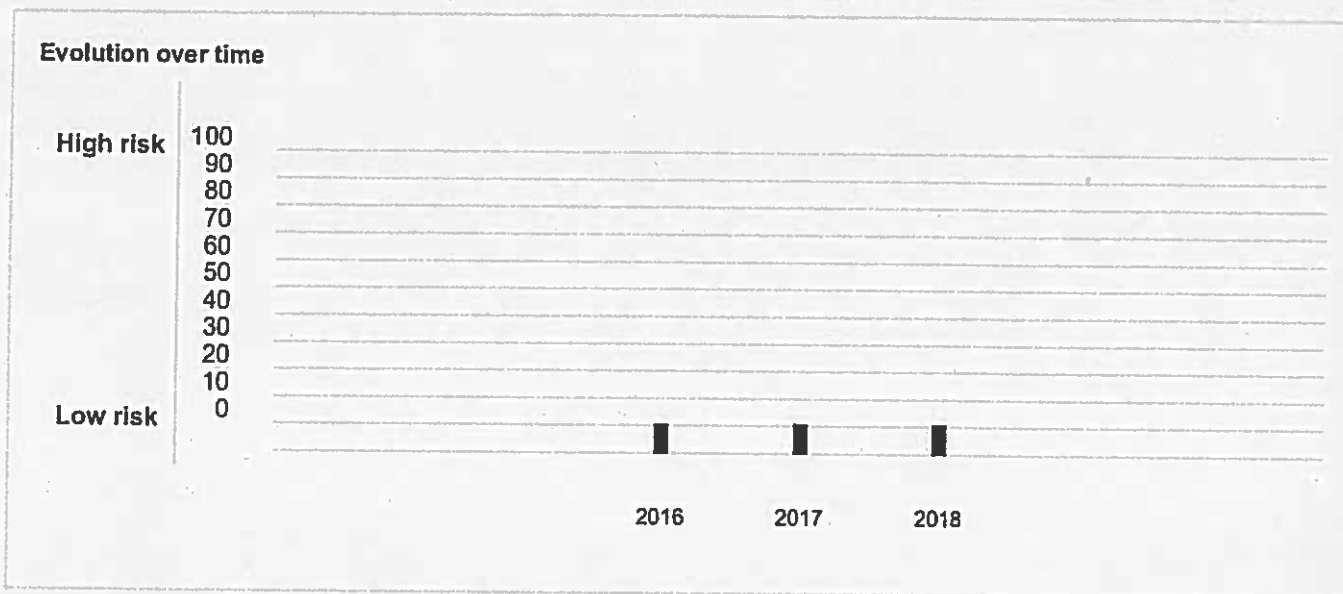


EXHIBIT 2



Evolution over time (Tabular view)

	2016	2017	2018
Environmental score (%)	0.91	0.97	0.99

Managed funds

There is no available data for this entity set

Current directors & managers

Management & staff 1

Senior Management

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director	CB
---	----

Source

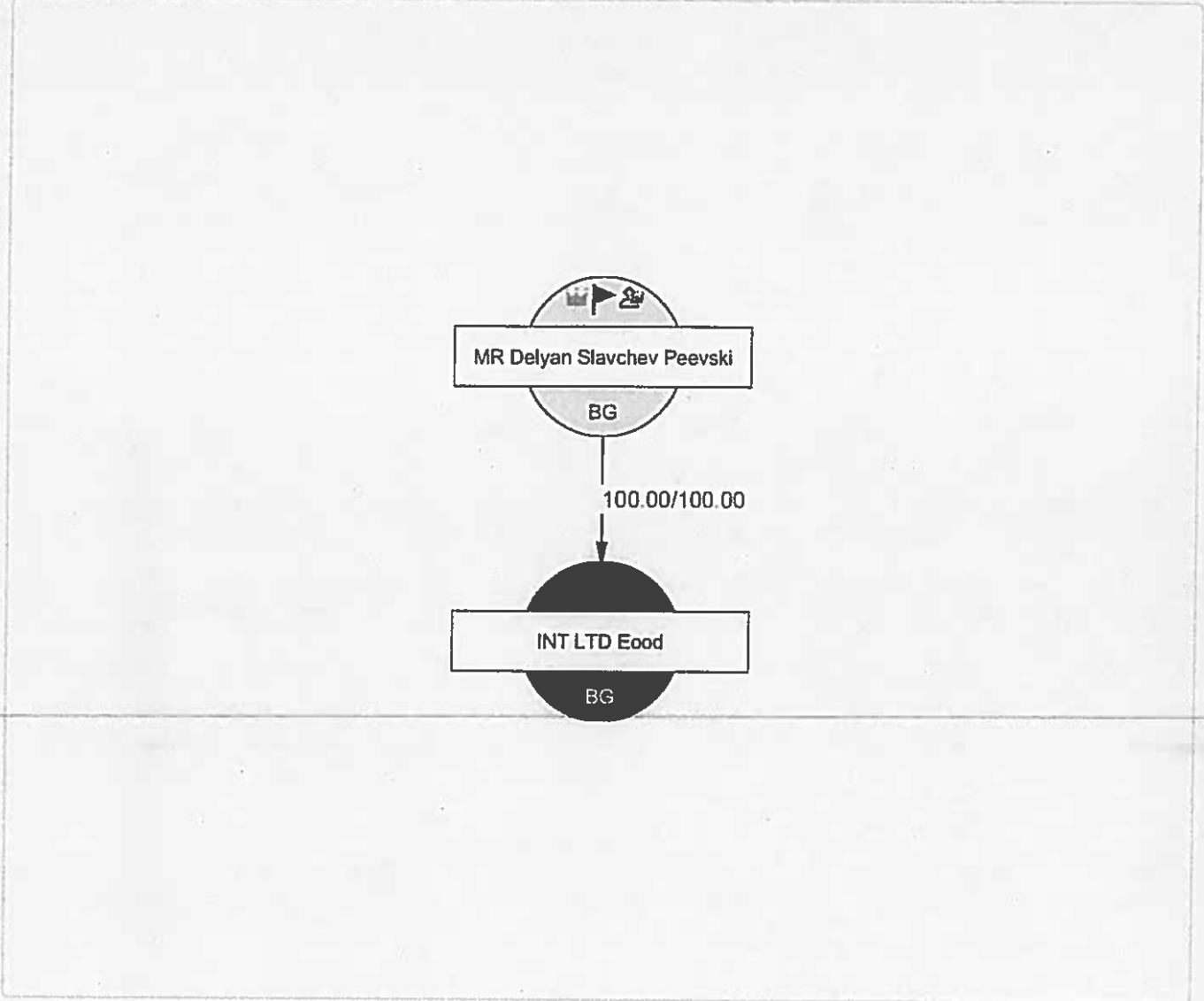
CB: Creditreform (Bulgaria)

Filters

Formal sources
Bodies & departments

Ownership structure

Graph : Shareholders



1 shareholder and the controlling shareholder path are represented.

Legend

- | | | | |
|---|--|------|-----------------------------|
| ↔ | Controlling shareholder | x/x | Direct / Total ownership % |
| ⊙ | An individual | BR | Branch |
| ⊙ | Beneficial Owner | CQP1 | 50% + 1 Share |
| ⊙ | Global Ultimate Owner | CTP | Calculated total percentage |
| ⊙ | There are names that are the same, or similar to, a risk relevant name | DM | Director/Manager |
| | | FC | Foreign company |
| | | GP | General partner |
| | | JO | Jointly owned, = 50 % |
| | | MO | Majority owned, > 50% |
| | | n.a. | Not available |



EXHIBIT 2

NG	Negligible, <=0.01%
REG	Beneficial Owner from register, = 100%
T	Sole trader, = 100 %
VE	Vessel
WO	Wholly owned, >= 98%

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Geographic footprint

Number of companies in the corporate group per country



The map represents the geographic location of the companies in the corporate group

All 10 companies in the corporate group are represented

Legend

Number of entities by country

- More than 1
- Less than 1

📍 Country of both the company and the GUO

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

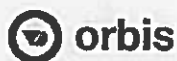


EXHIBIT 2

Corporate group

There are 10 companies in the corporate group

Name	Country	Ownership		Level of own.	Info Source
		Direct %	Total %		
Global Ultimate Owner					
MR DELYAN SLAVCHEV PEEVSKI	BG				

Ultimately owned subsidiaries

INT LTD EOOD	BG	100.00	100.00	1	CB
▶ INTRUST PLC EAD	BG	100.00	100.00	1	CB

Name	Date
------	------

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	
----------------------------	--

Ultimately owned subsidiaries

INT LTD EOOD	11/2020
▶ INTRUST PLC EAD	11/2020

Legend

▶ There are names that are the same, or similar to, a risk relevant name

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%
 I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Beneficial Owners

Beneficial Owner (1)					
Name	Country	Ownership Direct %	Ownership Total %	Source	
MR DELYAN SLAVCHEV PEEVSKI	BG	100.00	100.00	CB 11/2020	



EXHIBIT 2

INT LTD EOOD ▶ BG

Other Ultimate Beneficiary (0)

This company has no Other Ultimate Beneficiaries.

Beneficial Owner from register (0)

There are no Beneficial Owners from register for this company

Legend

- ▶ There are names that are the same, or similar to, a risk relevant name
- ⊗ Has enough influence power to control the result of a vote in the company

Beneficial Owner definition

The minimum percentage of ownership at first level is 10.00%, the minimum percentage at further levels is 50.01%.

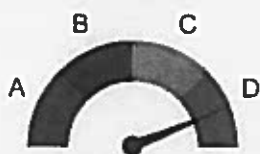
I also consider any individual at the top of a path who has an unknown percentage of ownership (% such as '>x%' are considered unknown)

I also consider any individual at the top of a path who has a percentage of minimum 10.00% (with the requested 50.01% at all other levels).

Beneficial Owners from register are not subject to the defined thresholds.

Controlling shareholders

BvD independence indicator



D - Direct majority ownership

Has an identified shareholder with over 50% direct ownership or is a branch/foreign company

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)
			Direct %	Total %	Source	Date	
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	100.00	100.00	CB	11/2020	-
INT LTD EOOD	▶ BG	C					0

Name	No of employees
MR DELYAN SLAVCHEV PEEVSKI	▶ -
INT LTD EOOD	▶ n.a.

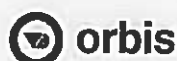


EXHIBIT 2

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

C = Corporate

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	
			Direct %	Total %	Source	Date		
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	=	100.00	100.00	CB	11/2020	-

Name	No of employees
MR DELYAN SLAVCHEV PEEVSKI	▶ -

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

Shareholders history

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	100.00	100.00	CB	11/2020	-	-
			100.00	100.00	CB	03/2020		
			100.00	100.00	CB	09/2019		
			100.00	100.00	CB	03/2019		
			100.00	100.00	CB	09/2018		
			100.00	100.00	CB	03/2018		
			100.00	100.00	CB	09/2017		

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

Previous shareholders



EXHIBIT 2

There is no data available for this entity.

Filters

Shareholders: All
All information since 01/2002

Shareholders by T-Rank

Name	Country	Type	T-rank (%)	Distance	Raw data	
					Direct (%)	Total (%)
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	100.00	1	100.00	

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

I = One or more named individuals or families

Filters

All shareholders
T-Rank threshold 5%
Sorted by T-rank percentage

Shareholder power & coalitions

Most influential shareholders

Name	Country	Type	Distance	Influence power (%)
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	1	100.0

Possible controlling coalitions

Controlling coalitions do not apply because there is a shareholder with enough influence power to control the result of a vote in the company: MR DELYAN SLAVCHEV PEEVSKI.

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

I One or more named individuals or families

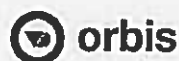


EXHIBIT 2

Research

Company profiles

Filters:

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

No data available for this company

Industry profiles

Source	Document	Type	Date
MarketLine Company operates in the industry	Global Real Estate	Industry profile	09/06/2020
	Global Real Estate		20/06/2019
	Global Real Estate		11/04/2018
	Global Real Estate		26/05/2017
	Global Real Estate		26/05/2017
	Global Real Estate		25/07/2016
	Global Real Estate		05/11/2015
	Global Real Estate		01/06/2014
	Global Real Estate		01/06/2014
	Global Real Estate		01/03/2009
	Global Real Estate		01/04/2008
	Global Real Estate		01/03/2007
	Global Real Estate		01/04/2006
	Global Real Estate		01/05/2005
	Global Real Estate		01/08/2004
	Global Real Estate		01/12/2003
MarketLine Company operates in the industry	Real Estate in Europe	Industry profile	09/06/2020
	Real Estate in Europe		20/06/2019



EXHIBIT 2

Real Estate in Europe	11/04/2018
Real Estate in Europe	26/05/2017
Real Estate in Europe	26/05/2017
Real Estate in Europe	25/07/2016
Real Estate in Europe	05/11/2015
Real Estate in Europe	01/06/2014
Real Estate in Europe	01/06/2014

Industry profiles Filters

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

My variables

Unconsolidated, Local registry filing
No data available for this company

Appendix – Omitted chapters

The chapters listed below have been omitted because they have no data for this company, or the data cannot be represented in the PDF

Public tenders
Detailed format
Cash flow statement
Segment data - Business lines
Segment data - Geographic segments
Graph - company ratings over time
Global score by WVB
Albatross score by Zanders
Compass score merchant risk by G2
RepRisk indicators by RepRisk
National scores
Stock profile
Annual stock data
Annual stock valuation
Pricing series
Beta and price volatility
Earnings estimates
Additional estimates
Brokers recommendations
Bonds and loans
Credit default swaps
Previous directors & managers
Current auditors, bankers & other advisors
Previous auditors, bankers & other advisors
Current subsidiaries
Branches
Innovation strength
Patent portfolio



EXHIBIT 2

Royalties agreements
Company and market news
FACTIVA news
Mergers & acquisitions
Crossborder investments
Liquidity events & potential beneficiaries
Local registry documents
aRMadillo
Global reports
EOL SEC filings

Exhibit 3 Withheld in Full

Bates: GLOMAG-23653 0143–0145



EXHIBIT 4



INTRUST PLC EAD

SOFIA, Bulgaria

Active

Private

BvD ID n° BG204589733

The Global Ultimate Owner of this controlled subsidiary is MR DELYAN SLAVCHEV PEEVSKI

Key information

EKZARH YOSIF, 119 1000 SOFIA Bulgaria		Activity: Corporate, Property Services Date of incorporation: 2017
Turnover for 2019 \$ 22.3 m ↘ -12.2%	Net income for 2019 \$ 17.7 m ↗ +55%	
Ownership 1 shareholder 7 subsidiaries 10 companies in the corporate group	PEPs and sanctions ▶ This company is not the same or similar to a risk relevant name	



EXHIBIT 4

Financial profile

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
Operating revenue (Turnover)	22,292,361 ↘	25,394,568 ↗	6,001,962
P/L before tax	19,665,710 ↗	12,793,584 ↗	5,458,057
P/L for period [=Net income]	17,668,581 ↗	11,407,915 ↗	4,912,313
Cash flow	18,134,980 ↗	11,540,218	n.a.
Total assets	39,031,017 ↗	32,344,573 ↗	27,032,744
Shareholders funds	20,679,495 ↗	13,749,561 ↗	7,365,097
Current ratio (x)	1.17 ↗	0.77 ↗	0.57
Profit margin (%)	88.22 ↗	50.38 ↘	90.94
ROE using P/L before tax (%)	95.10 ↗	93.05 ↗	74.11
ROCE using P/L before tax (%)	77.10 ↗	44.77 ↘	75.07
Solvency ratio (Asset based) (%)	52.98 ↗	42.51 ↗	27.25
Number of employees	29	n.a.	n.a.

Management

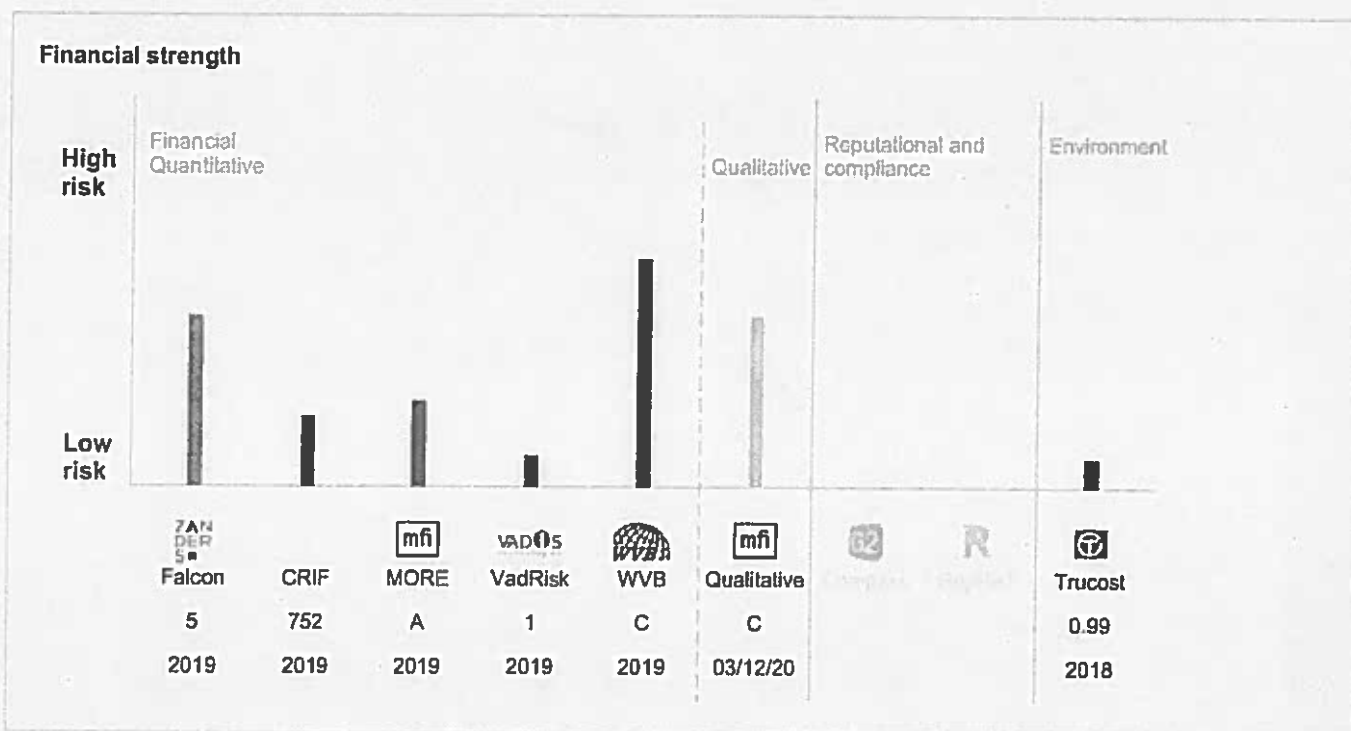
Mr Aleksandar Kirilov Georgiev

News stories since last year

0 negative stories
1 stories in total



EXHIBIT 4



Contact

Contact information

EKZARH YOSIF, 119
1000 SOFIA
Bulgaria

Oblast

Sofia City

NUTS1

BG4 - Southwestern and South-Central Bulgaria

NUTS2

BG41 - Yugozapaden

NUTS3

BG412 - Sofia City

Industry & activities

Type of entity: Corporate
 BvD sector: Property Services
 NACE Rev. 2 main section: L - Real estate activities
 Products & services: Real estate agents and managers [source: Bureau van Dijk]

NACE Rev. 2 code(s)

Core code: 6810 Buying and selling of own real estate
 Primary code(s): 6810 Buying and selling of own real estate

NAICS 2017 code(s) (derived from NACE Rev. 2 codes)

Core code: 5312 Offices of Real Estate Agents and Brokers
 Primary code(s): 531210 Offices of Real Estate Agents and Brokers

US SIC code(s) (derived from NACE Rev. 2 codes)

Core code: 653 Real estate agents and managers



EXHIBIT 4

Primary code(s): 6531 Real estate agents and managers

Trade description

Engaged as real estate agents and managers [source: Bureau van Dijk]

Identifiers

BvD ID number	BG204589733
BvD account number	BG204589733U
BvD9 number	319529089
UIC (Trade register number)	204589733
European VAT number	BG204589733
TIN (TIN)	204589733
LEI (Company ID)	485100GBI2SE0KIX8T70

Legal Entity Identifier (LEI) details

LEI	485100GBI2SE0KIX8T70
Registration status	Issued
First assignment date	05/11/2020
Annual renewal date	05/11/2021
Managing Local Operating Unit	KDD - Centralna klirinško depotna družba d.d. (Central Securities Clearing Corporation, Slovenia) (Slovenia)

Legal information

Active(updated in Orbis on 24/05/2017)

One-person public limited company - EAD
Incorporated in 2017
Corporate

PEPs and sanctions

▶ This company is not the same or similar to a risk relevant name

Accounting information

Information for this record is provided by Creditreform Bulgaria (last delivery: 29/11/2020)

Most recent accounts:	2019
Available in Orbis since	06/2020
Types of account:	Unconsolidated
Available for:	3 years

Accounts published in:	BGN
Closing date:	31/12/2019
Filing type:	Local registry filing
Accounting template:	Corporate

Available account

31/12/2019 Unconsolidated, Local registry filing

Key indicators based on Unconsolidated, Local registry filing



EXHIBIT 4

Turnover for 2019 \$ 22.3 m ↘ -12.2%	Number of employees 29 ■
---	---

Legal events

Date	Type	Description	Source
01/06/2017	Registration	VAT registration	Registry Agency (BULSTAT register)
12/05/2017	Registration	Founded as EAD (one person joint stock co.)	Registry Agency (BULSTAT register)

Key financials & employees

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Operating revenue (Turnover)	22,292,361	25,394,568	6,001,962
L P/L before tax	19,665,710	12,793,584	5,458,057
L P/L for period [=Net income]	17,668,581	11,407,915	4,912,313
L Cash flow	18,134,980	11,540,218	n.a.
L Total assets	39,031,017	32,344,573	27,032,744
L Shareholders funds	20,679,495	13,749,561	7,365,097
L Current ratio (x)	1.17	0.77	0.57
L Profit margin (%)	88.22	50.38	90.94
L ROE using P/L before tax (%)	95.10	93.05	74.11
L ROCE using P/L before tax (%)	77.10	44.77	75.07
L Solvency ratio (Asset based) (%)	52.98	42.51	27.25
L Number of employees	29	n.a.	n.a.

Global standard format

Unconsolidated, Local registry filing

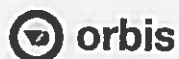


EXHIBIT 4

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320

Balance sheet

Assets

Fixed assets	24,039,633	29,577,918	15,739,514
L Intangible fixed assets	12,636	0	0
L Tangible fixed assets	21,072,947	10,708,933	14,047,093
L Other fixed assets	2,954,049	18,868,985	1,692,421
Current assets	14,991,384	2,766,655	11,293,230
L Stock	242,389	2,342	12,264
L Debtors	58,013	168,013	4,567,697
L Other current assets	14,690,982	2,596,300	6,713,269
L Cash & cash equivalent	10,388,283	474,769	3,065,367
Total assets	39,031,017	32,344,573	27,032,744

Liabilities & equity

Shareholders funds	20,679,495	13,749,561	7,365,097
L Capital	2,297,530	2,341,646	2,452,784
L Other shareholders funds	18,381,965	11,407,915	4,912,313
Non-current liabilities	5,530,730	14,996,488	0
L Long term debt	5,521,539	0	0
L Other non-current liabilities	9,190	14,996,488	0
L Provisions	0	0	0
Current liabilities	12,820,793	3,598,525	19,667,647
L Loans	2,027,570	0	0
L Creditors	17,231	3,262,499	16,715,109
L Other current liabilities	10,775,991	336,026	2,952,539
Total shareh. funds & liab.	39,031,017	32,344,573	27,032,744

Memo lines

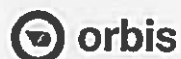


EXHIBIT 4

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Working capital	-2,839,173	-474,769	-3,065,367
L Net current assets	2,170,592	-831,870	-8,374,417
L Enterprise value	n.a.	n.a.	n.a.
L Number of employees	29	n.a.	n.a.

Profit & loss account

L Operating revenue (Turnover)	22,292,361	25,394,568	6,001,962
L Sales	22,292,361	25,394,568	6,001,962
L Costs of goods sold	n.a.	n.a.	n.a.
L Gross profit	n.a.	n.a.	n.a.
L Other operating expenses	n.a.	n.a.	n.a.
L Operating P/L [=EBIT]	8,277,427	12,843,929	5,449,472
L Financial P/L	11,388,283	-50,345	8,585
L Financial revenue	11,932,223	26,929	79,715
L Financial expenses	543,940	77,274	71,131
L P/L before tax	19,665,710	12,793,584	5,458,057
L Taxation	1,997,128	1,385,669	545,744
L P/L after tax	17,668,581	11,407,915	4,912,313
L Extr. and other P/L	0	0	0
L Extr. and other revenue	0	0	0
L Extr. and other expenses	0	0	0
L P/L for period [=Net income]	17,668,581	11,407,915	4,912,313

Memo lines

L Export revenue	n.a.	n.a.	n.a.
L Material costs	109,707	92,495	1,226
L Costs of employees	334,291	73,176	n.a.
L Depreciation & Amortization	466,399	132,303	n.a.



EXHIBIT 4

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Other operating items	13,104,538	12,252,664	551,263
L Interest paid	542,217	77,274	71,131
L Research & Development expenses	n.a.	n.a.	n.a.
L Cash flow	18,134,980	11,540,218	n.a.
L Added value	21,008,616	13,076,338	n.a.
L EBITDA	n.a.	n.a.	n.a.

Global ratios

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320

Profitability ratios

L ROE using P/L before tax (%)	95.10	93.05	74.11
L ROCE using P/L before tax (%)	77.10	44.77	75.07
L ROA using P/L before tax (%)	50.39	39.55	20.19
L ROE using Net income (%)	85.44	82.97	66.70
L ROCE using Net income (%)	69.48	39.95	67.66
L ROA using Net income (%)	45.27	35.27	18.17
L Profit margin (%)	88.22	50.38	90.94
L Gross margin (%)	n.a.	n.a.	n.a.
L EBITDA margin (%)	n.a.	n.a.	n.a.
L EBIT margin (%)	37.13	50.58	90.80
L Cash flow / Operating revenue (%)	81.35	45.44	n.a.
L Enterprise value / EBITDA (x)	n.a.	n.a.	n.a.

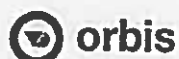


EXHIBIT 4

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
L Market cap / Cash flow from operations (x)	n.a.	n.a.	n.a.

Operational ratios

L Net assets turnover (x)	0.85	0.88	0.82
L Interest cover (x)	15.27	166.21	76.61
L Stock turnover (x)	91.97	n.s.	489.40
L Collection period (days)	1	2	274
L Credit period (days)	0	46	n.s.
L Export revenue / Operating revenue (%)	n.a.	n.a.	n.a.
L R&D expenses / Operating revenue (%)	n.a.	n.a.	n.a.

Structure ratios

L Current ratio (x)	1.17	0.77	0.57
L Liquidity ratio (x)	1.15	0.77	0.57
L Shareholders liquidity ratio (x)	3.74	0.92	n.s.
L Solvency ratio (Asset based) (%)	52.98	42.51	27.25
L Solvency ratio (Liability based) (%)	n.s.	73.94	37.45
L Gearing (%)	36.55	109.07	0.00

Per employee ratios

L Profit per employee (th)	678	n.a.	n.a.
L Operating revenue per employee (th)	769	n.a.	n.a.
L Costs of employees / Operating revenue (%)	1.50	0.29	n.a.
L Average cost of employee (th)	12	n.a.	n.a.
L Shareholders funds per employee (th)	713	n.a.	n.a.

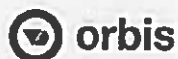
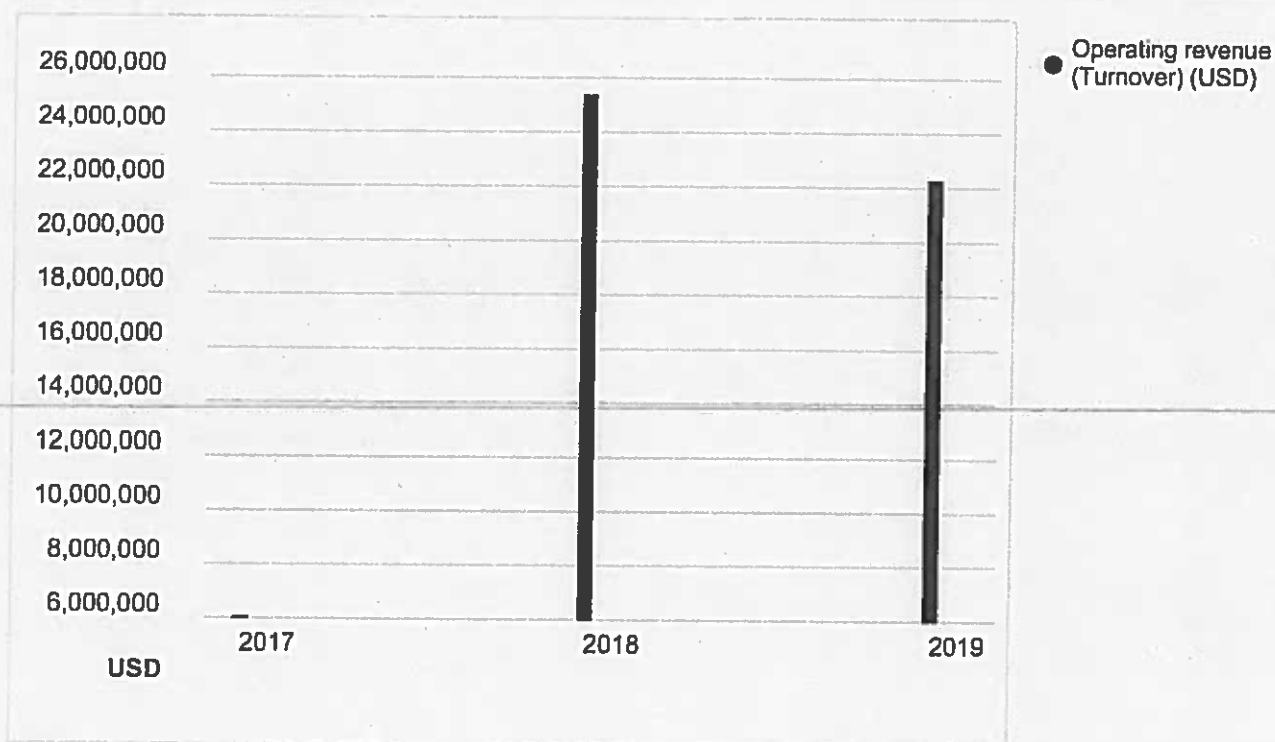


EXHIBIT 4

	31/12/2019	31/12/2018	31/12/2017
	USD	USD	USD
	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541	0.61320
└ Working capital per employee (th)	-98	n.a.	n.a.
└ Total assets per employee (th)	1,346	n.a.	n.a.

Graph - Value over time



Graph - Indices of several values over time

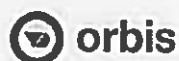
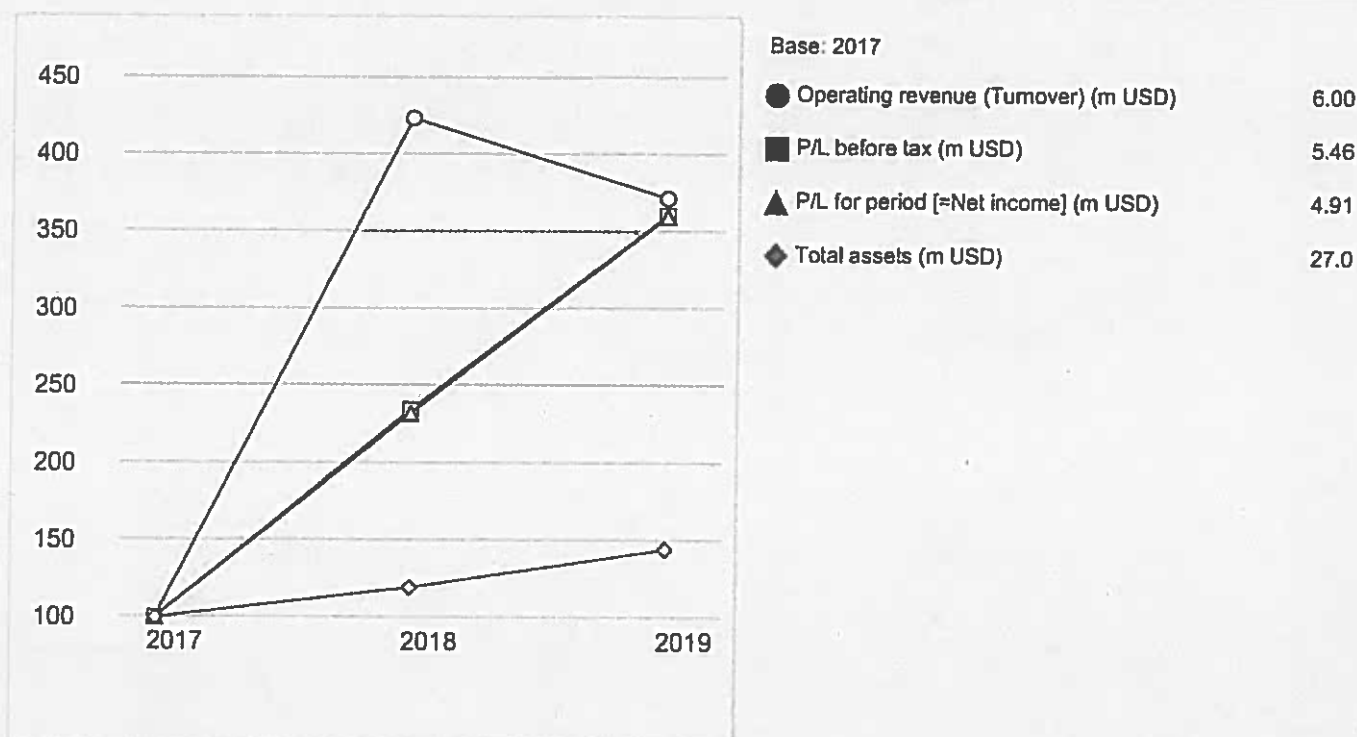


EXHIBIT 4



Peer comparison

Accounting year: Peer group year	Year	Operating revenue (Turnover) th USD	PiL before tax th USD
Median		22,317	486
Standard deviation		27	7,694
Average		22,304	2,978

GRAND JAPAN INC.	2019	22,267	10	520	3
TECHNO PARK EMPREENDIMENTOS E ADMINISTRACA	2019	22,332	1	n.a.	
CORDUROY S/A	2019	22,332	1	n.a.	
DRAGER DO BRASIL LTDA	2019	22,332	1	n.a.	
GERONAL DO BRASIL PARTICIPACOES LTDA	2019	22,332	1	n.a.	
KATSUSHICHI KOSAN KK	2019	22,317	5	1,303	2
MARUJE CO.,LTD.	2019	22,309	6	335	5
CHEONJIIN PLUS CO.,LTD	2019	22,303	7	452	4
INTRUST PLC EAD	2019	22,292	8	19,666	1
OHKURAYA FUDOSAN	2019	22,272	9	n.a.	
SILCOGE - SOCIEDADE CONSTRUTORA DE OBRAS GE	2019	22,254	11	-4,406	6

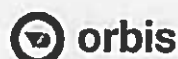


EXHIBIT 4

Accounting year: Peer group year	Year	P/L for period [=Net income] th USD	Total assets th USD
Median		452	26,075
Standard deviation		6,534	33,334
Average		2,289	35,835

GRAND JAPAN INC.	2019	330	5	10,883	5
TECHNO PARK EMPREENDIMENTOS E ADMINISTRACA	2019	n.a.		n.a.	
CORDUROY S/A	2019	n.a.		n.a.	
DRAGER DO BRASIL LTDA	2019	n.a.		n.a.	
GERONAL DO BRASIL PARTICIPACOES LTDA	2019	n.a.		n.a.	
KATSUSHICHI KOSAN KK	2019	925	3	40,544	2
MARUJE CO.,LTD.	2019	-90	6	13,120	4
CHEONJIIN PLUS CO.,LTD	2019	452	4	7,209	6
INTRUST PLC EAD	2019	17,669	1	39,031	3
OHKURAYA FUDOSAN	2019	1,272	2	n.a.	
SILCOGE - SOCIEDADE CONSTRUTORA DE OBRAS GE	2019	-4,536	7	104,221	1

Accounting year: Peer group year	Year	Shareholders funds th USD	Number of employees
Median		4,687	17
Standard deviation		7,644	21
Average		7,269	24

GRAND JAPAN INC.	2019	2,770	4	37	3
TECHNO PARK EMPREENDIMENTOS E ADMINISTRACA	2019	n.a.		3	10
CORDUROY S/A	2019	n.a.		76	1
DRAGER DO BRASIL LTDA	2019	n.a.		3	10
GERONAL DO BRASIL PARTICIPACOES LTDA	2019	n.a.		36	4
KATSUSHICHI KOSAN KK	2019	13,728	2	17	6
MARUJE CO.,LTD.	2019	6,603	3	7	8
CHEONJIIN PLUS CO.,LTD	2019	225	5	4	9
INTRUST PLC EAD	2019	20,679	1	29	5
OHKURAYA FUDOSAN	2019	n.a.		38	2
SILCOGE - SOCIEDADE CONSTRUTORA DE OBRAS GE	2019	-392	6	15	7

Peer group definition

Closest 10 international companies according to the Operating revenue (Turnover) of the subject company for the last available year (2019) amongst the standard peer group.

The standard peer group is based on NACE Rev. 2 industry classification: 6810 - Buying and selling of own real estate.



EXHIBIT 4

Company ratings

No data available for this company

Country ratings

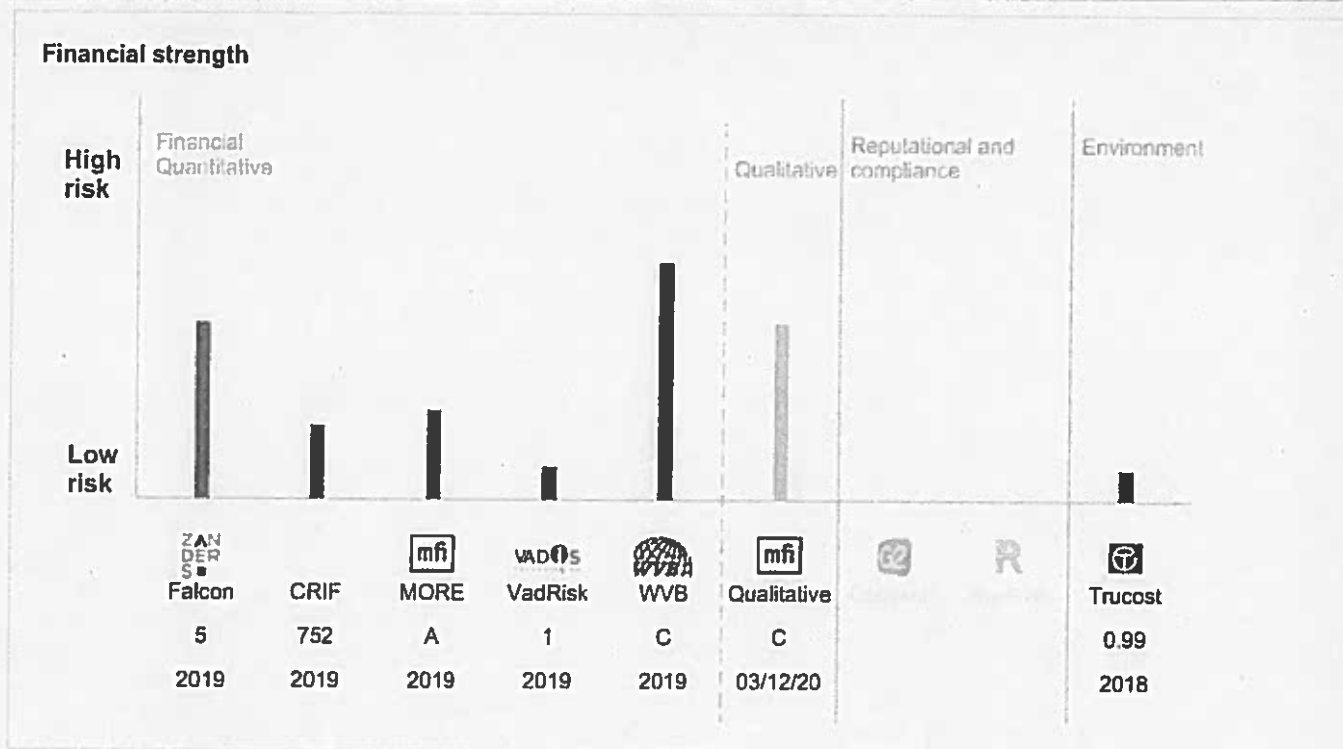
Your subscription does not include some of the agency ratings.

EIU

	Rating	Date	Action/Direction	Outlook	Watch
Overall country rating	BBB	01/09/2020			
Banking sector rating	BB	01/09/2020		Stable	

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Financial strength summary



Falcon counterparty risk score by Zanders

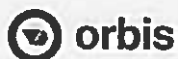
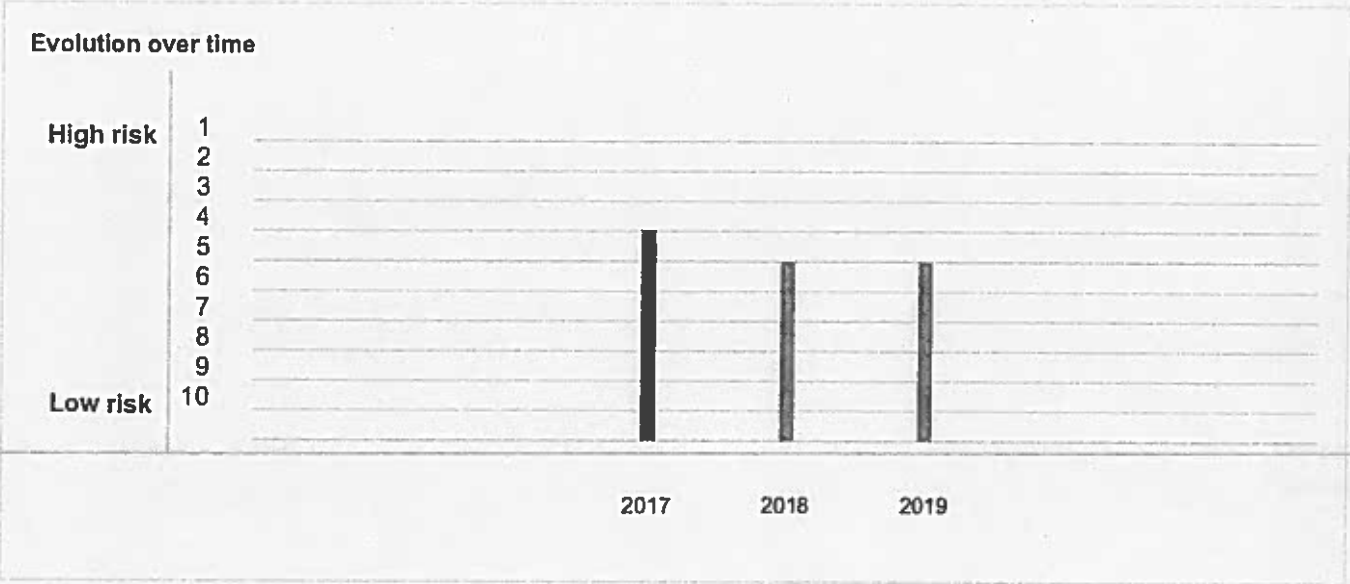


EXHIBIT 4



Probability of default:	1.01%
Credit limit:	258,382 \$
Industry:	Real estate activities



Evolution over time (Tabular view)

	2017	2018	2019
Counterparty Risk Score (CRS)	4	5	5
Probability of default (%)	1.61	1.01	1.01
Falcon credit limit (th \$)	29	112	258

Observations

- 2019 Original currency is not EUR
- 2018 Original currency is not EUR
- 2017 Original currency is not EUR

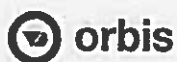


EXHIBIT 4

Falcon influencing ratios

	2017	2018	2019
Operations and Liquidity			
Turnover growth	2	10	2
Return on sales	10	9	10
Current ratio	2	2	3
Debtor days	2	4	9
Debt services			
Interest coverage ratio	10	10	9
Debt/EBITDA	2	2	2
Capital structure			
Gearing	7	5	7
Solvency	4	6	7
Tangible net worth	3	4	5

Financial stability score by CRIF Decision Solutions Ltd



752
for 2019

Key influencing factors

- Profitability
- Financial leverage
- Operational efficiency

Scores for peer group

245 Minimum
608 Average
824 Maximum

Industry Buying and selling of own real estate

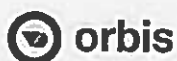
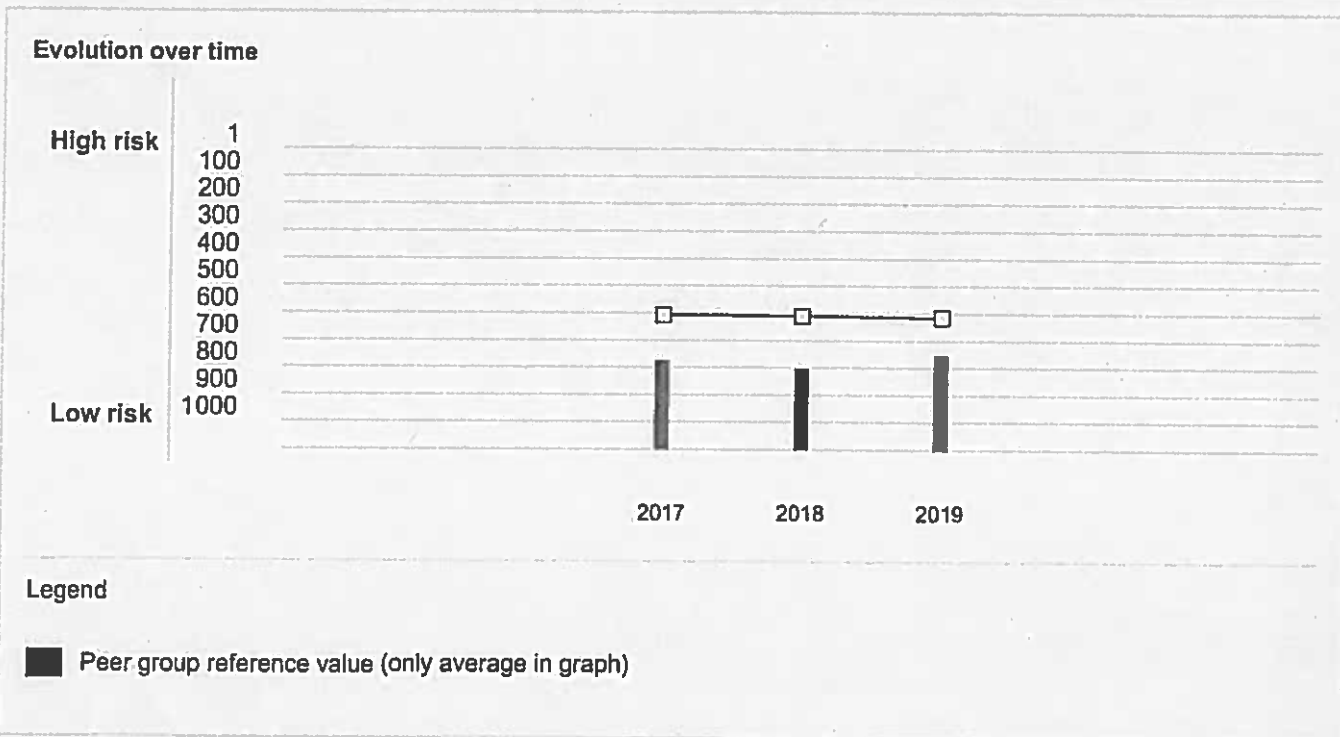


EXHIBIT 4



Evolution over time (Tabular view)

	2017	2018	2019
Company	772	802	752
Key factors	<ul style="list-style-type: none"> - Asset management efficiency - Financial leverage 	<ul style="list-style-type: none"> - Financial leverage - Asset management efficiency - Operational efficiency 	<ul style="list-style-type: none"> - Profitability - Financial leverage - Operational efficiency
Peer group			
Minimum	245	265	250
Average	608	609	614
Maximum	824	834	834

MORE credit risk score by modeFinance

A - Healthy
for 2019

Confidence level: 86%

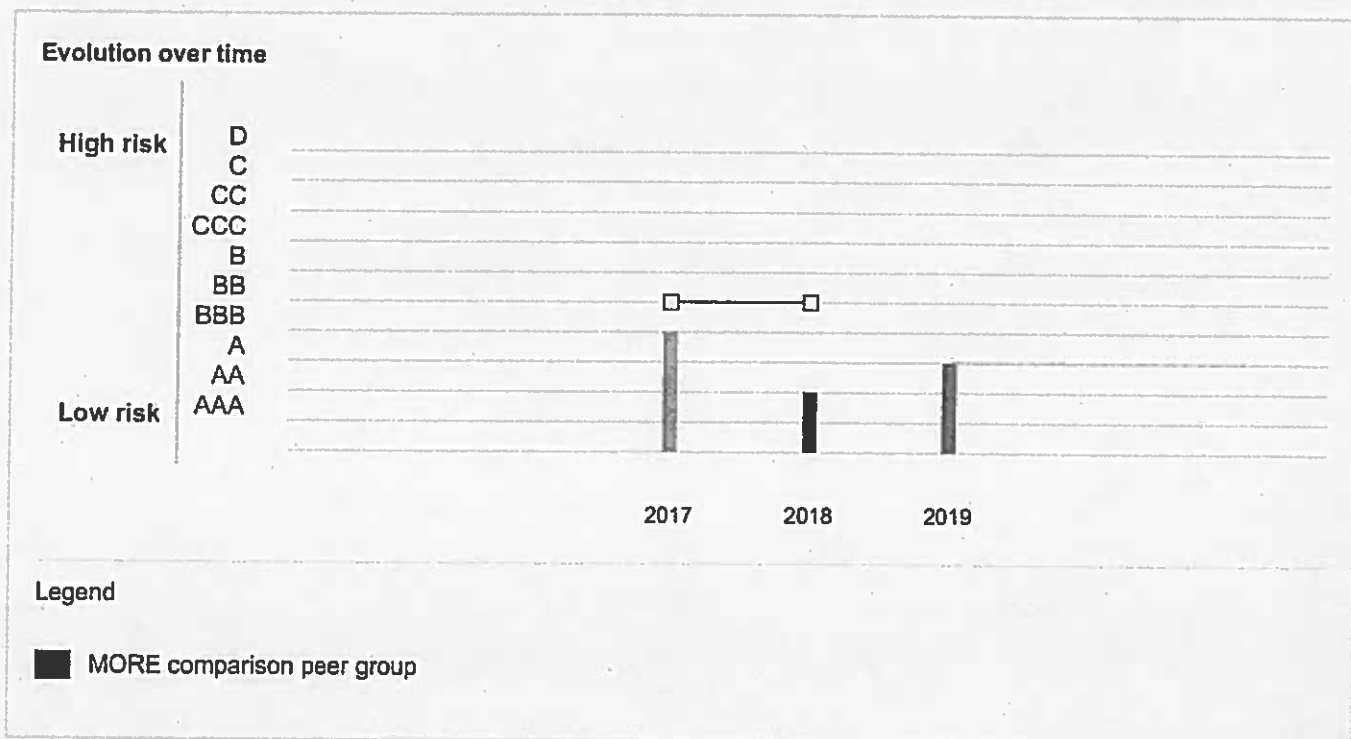
Probability of default: 0.30%

Credit limit: 651,572 \$

Industry: Services



EXHIBIT 4



Evolution over time (Tabular view)

	2017	2018	2019
Score			
Company	BBB	AA	A
Peer group	BB	BB	n.a.
Probability of default (%)			
Company	1.40	0.25	0.30
Peer group	2.10	1.90	n.a.
Confidence level (%)			
Company	86	86	86
Credit limit (th \$)			
Company	126	847	652



EXHIBIT 4

MORE influencing ratios

2017 2018 2019

Solvency ratios

Leverage ratio	BBB	AA	AA
Assets to debt	BBB	AA	AAA

Liquidity ratios

Current ratio		B	BBB
Quick ratio	B	BB	BBB
Cash conversion cycle (CCC)	C	A	

Profitability and economic ratios

Return on investment (ROI)		AAA	AAA
Return on equity (ROE)	AAA	AAA	AAA
Asset turnover	CC	B	
Interest coverage ratio			
Interest paid coverage	AA	AAA	BB

Predictive Indicators by Vadis

Propensity of bankruptcy



Risk of bankruptcy lower than national average
for 2019

Key influencing factors:

- + Company's group
- + Credit period
- + Evolution of tangible fixed assets
- + Company's ownership key performance indicators
- + Evolution of added value

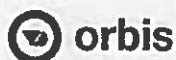
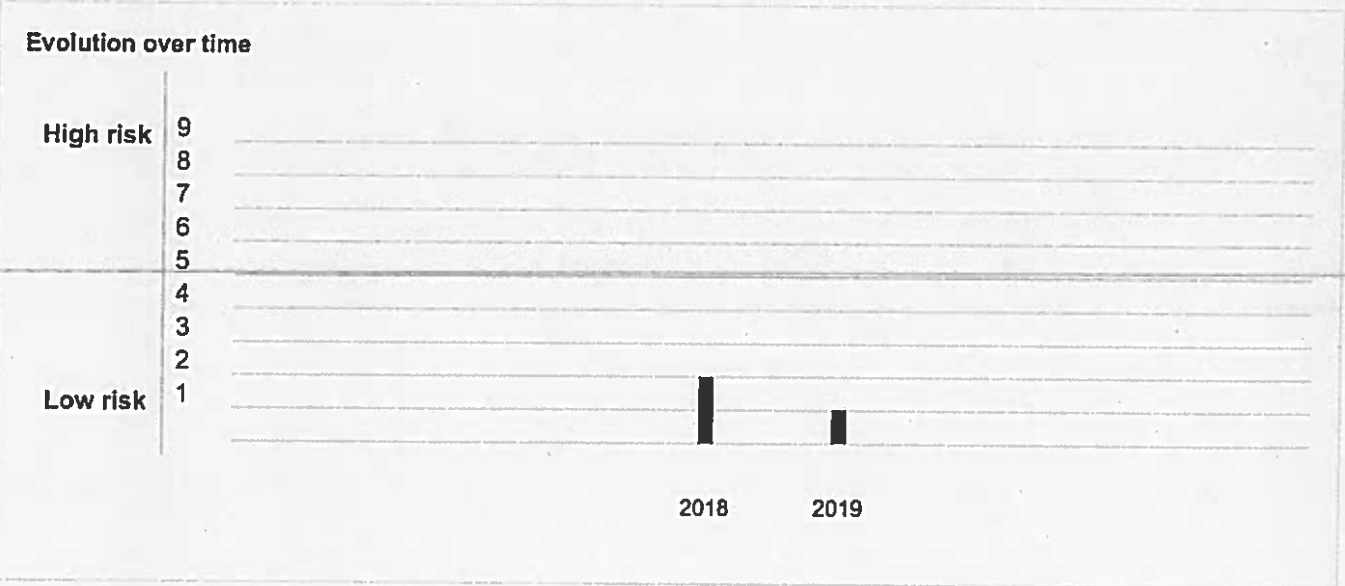
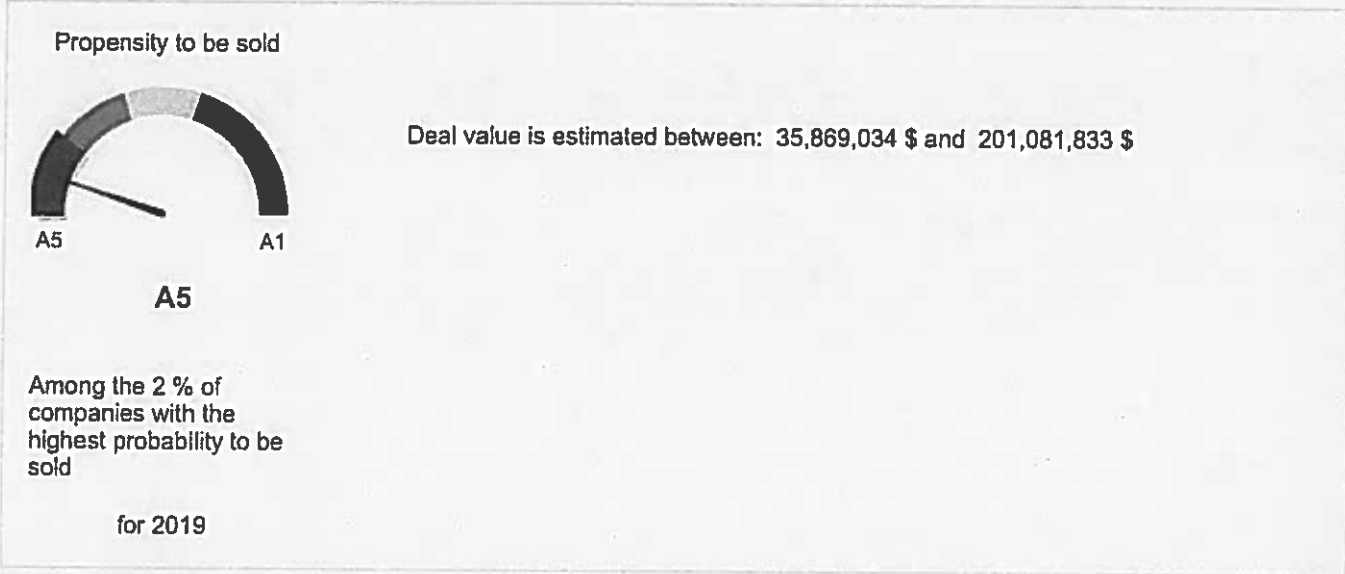


EXHIBIT 4



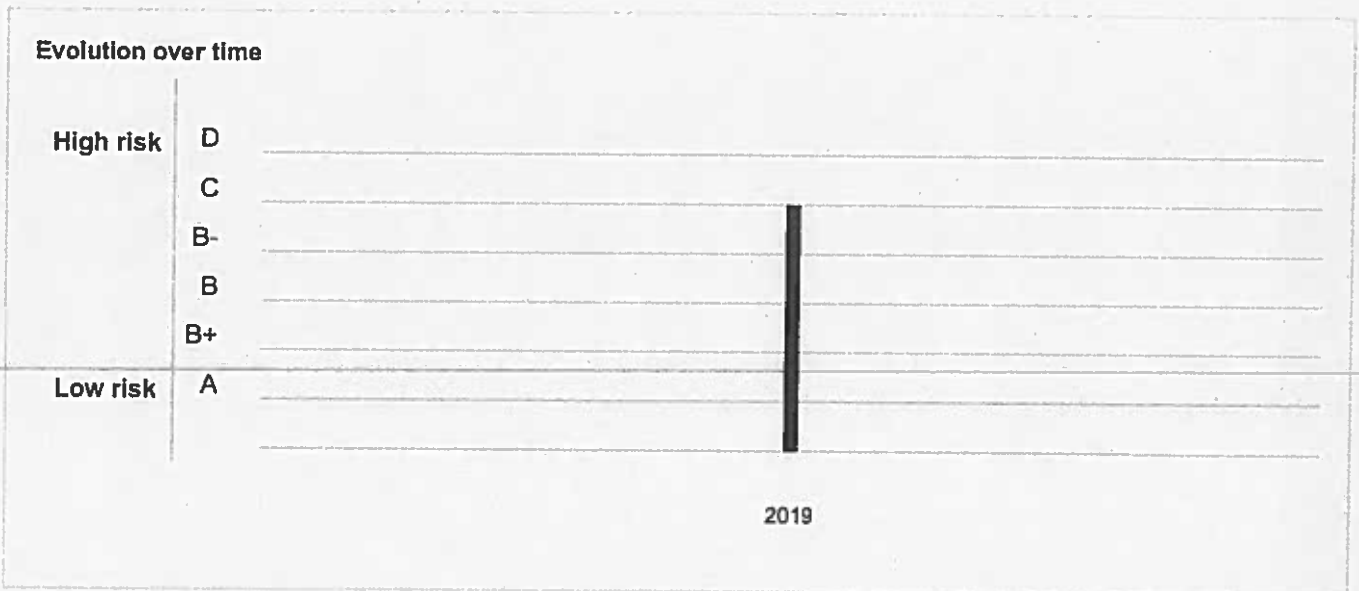
Evolution over time (Tabular view)

	2018	2019
Propensity of bankruptcy	2	1
Key influencing factors	<ul style="list-style-type: none"> + Company's group - Evolution of tangible fixed assets + Company's ownership key performance indicators + Company's ownership key performance indicators - Evolution of other current liabilities / current liabilities (company's sector financials) 	<ul style="list-style-type: none"> + Company's group + Credit period + Evolution of tangible fixed assets + Company's ownership key performance indicators + Evolution of added value
Propensity to be sold	A5	A5
Estimated deal value		
Lower bound (th \$)	43,027	35,869
Upper bound (th \$)	232,569	201,082



EXHIBIT 4

Global score by WVB



Evolution over time (Tabular view)

2019

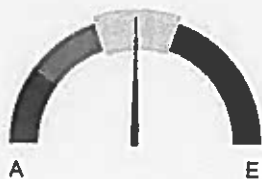
WVB Global score

C

Qualitative score by modeFinance



EXHIBIT 4



C - Sufficient

on 03/12/2020

Confidence level: 73.0%

Credit limit:

n.a.

No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.

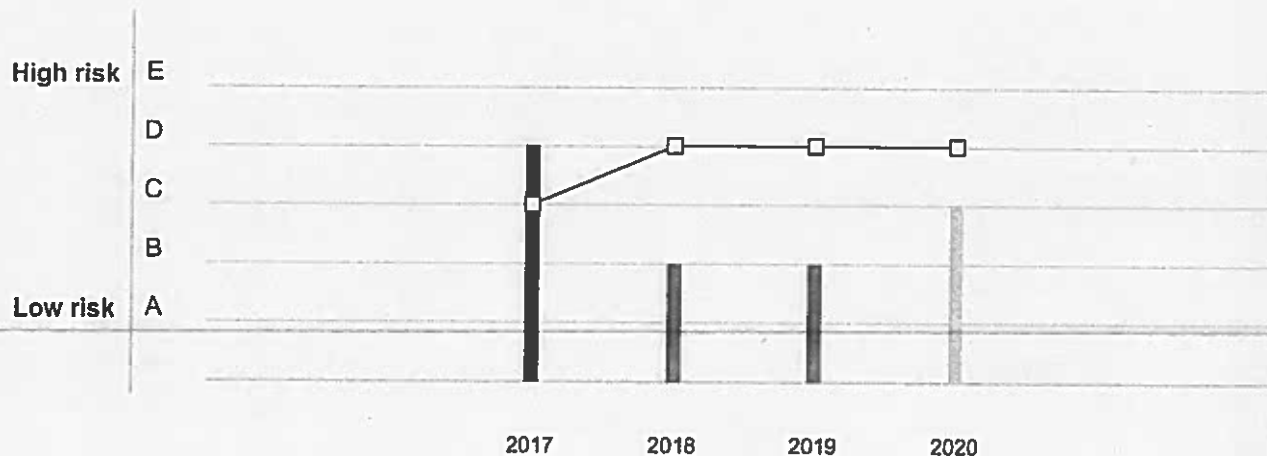
Key influencing factors:

- A - GUO MORE score / status
- E - Subsidiaries average MORE score / status
- D - Directors average MORE score / status

Industry score:

D

Evolution over time



Legend

■ Industry score



EXHIBIT 4

Evolution over time (Tabular view)

	2017	2018	2019	03/12/2020
Qualitative score	D	B	B	C
Confidence level (%)	34	72	72	73
Credit limit	n.a.	n.a.	n.a.	n.a.
Industry score	C	D	D	D

Credit limit annotations

03/12/2020	No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
2019	No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
2018	No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
2017	No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.

Environmental score by Trucost

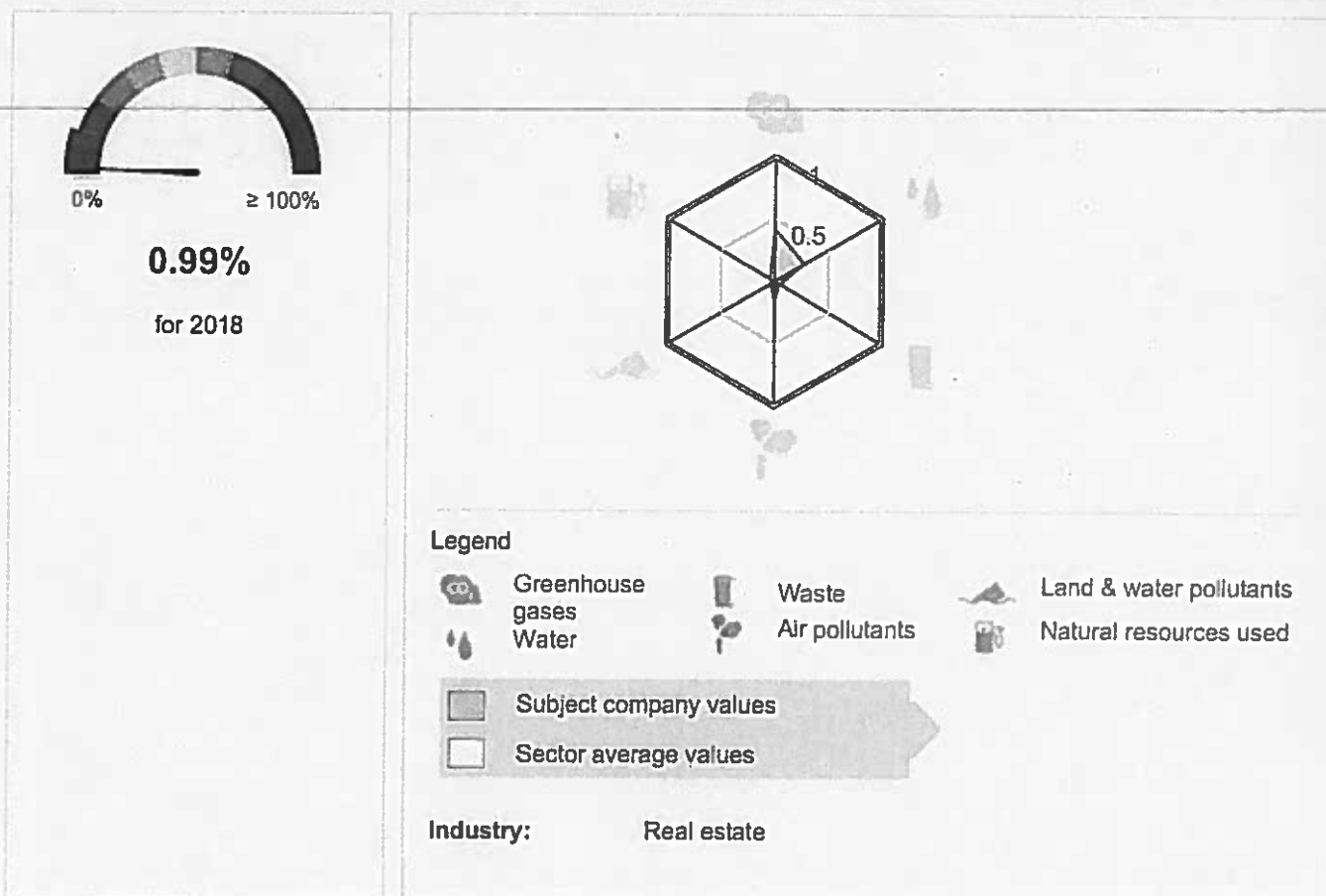
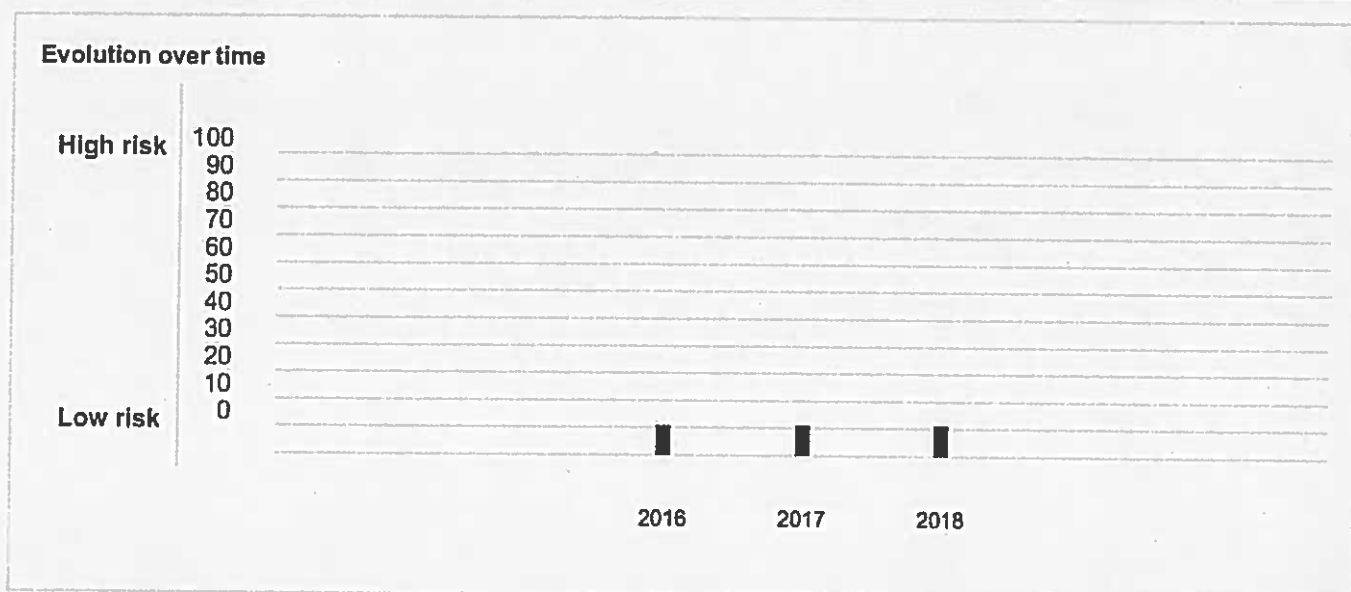




EXHIBIT 4

**Evolution over time (Tabular view)**

	2016	2017	2018
Environmental score (%)	0.91	0.97	0.99

Managed funds

There is no available data for this entity set

Current directors & managers

Boards & committees 2

Boards of directors

MS VIOLETA GETOVA DIMITROVA Member of the Board	CB
MS DORA HRISTOVA SPASOVA Member of the Board	CB

Management & staff 1

Senior Management

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director	CB
---	----



EXHIBIT 4

Source

CB:Creditreform (Bulgaria)

Filters

Formal sources
Bodies & departments

Previous directors & managers

Boards & committees 1

Boards of directors

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director and Chairman of the Board	CB
---	----

Management & staff 1

Senior Management

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director and Chairman of the Board	CB
---	----

Source

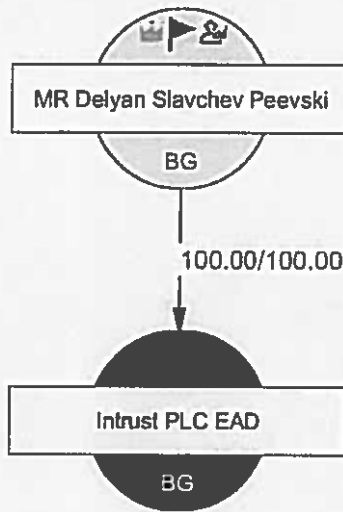
CB:Creditreform (Bulgaria)

Filters

Formal sources
Bodies & departments

Ownership structure

Graph : Shareholders



1 shareholder and the controlling shareholder path are represented.

Legend






- | | | | |
|---|--|------|--|
|  | Controlling shareholder | x/x | Direct / Total ownership % |
|  | An individual | BR | Branch |
|  | Beneficial Owner | CQP1 | 50% + 1 Share |
|  | Global Ultimate Owner | CTP | Calculated total percentage |
|  | There are names that are the same, or similar to, a risk relevant name | DM | Director/Manager |
| | | FC | Foreign company |
| | | GP | General partner |
| | | JO | Jointly owned, = 50 % |
| | | MO | Majority owned, > 50% |
| | | n.a. | Not available |
| | | NG | Negligible, <=0.01% |
| | | REG | Beneficial Owner from register, = 100% |



EXHIBIT 4

T	Sole trader, = 100 %
VE	Vessel
WO	Wholly owned, >= 98%

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Geographic footprint

Number of companies in the corporate group per country



The map represents the geographic location of the companies in the corporate group

All 10 companies in the corporate group are represented

Legend

Number of entities by country

- More than 1
- Less than 1

Country of both the company and the GUO

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Corporate group



EXHIBIT 4

There are 10 companies in the corporate group

Name	Country	Ownership		Level of own.	Info Source
		Direct %	Total %		

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	▶	BG				
----------------------------	---	----	--	--	--	--

Ultimately owned subsidiaries

INT LTD EOOD	▶	BG	100.00	100.00	1	CB
▶ INTRUST PLC EAD		BG	100.00	100.00	1	CB

Name	Date
------	------

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	▶
----------------------------	---

Ultimately owned subsidiaries

INT LTD EOOD	▶	11/2020
▶ INTRUST PLC EAD		11/2020

Legend

▶ There are names that are the same, or similar to, a risk relevant name

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%
I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Beneficial Owners

Beneficial Owner (1)					
Name	Country	Ownership Direct %	Ownership Total %	Source	
MR DELYAN SLAVCHEV PEEVSKI Bulgaria					Distance: 1 ▶
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	100.00	100.00	CB	11/2020
INTRUST PLC EAD	BG				



EXHIBIT 4

Other Ultimate Beneficiary (0)

This company has no Other Ultimate Beneficiaries.

Beneficial Owner from register (0)

There are no Beneficial Owners from register for this company

Legend

- ▶ There are names that are the same, or similar to, a risk relevant name
- ⊕ Has enough influence power to control the result of a vote in the company

Beneficial Owner definition

The minimum percentage of ownership at first level is 10.00%, the minimum percentage at further levels is 50.01%.

I also consider any individual at the top of a path who has an unknown percentage of ownership (% such as '>x%' are considered unknown)

I also consider any individual at the top of a path who has a percentage of minimum 10.00% (with the requested 50.01% at all other levels).

Beneficial Owners from register are not subject to the defined thresholds.

Controlling shareholders

BvD independence indicator

**D - Direct majority ownership**

Has an identified shareholder with over 50% direct ownership or is a branch/foreign company

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)
			Direct %	Total %	Source	Date	
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	100.00	100.00	CB	11/2020	-
INTRUST PLC EAD	BG	C					22
Name	No of employees						
MR DELYAN SLAVCHEV PEEVSKI	▶						-
INTRUST PLC EAD							29

Legend

- ▶ There are names that are the same, or similar to, a risk relevant name
- I = One or more named individuals or families
- C = Corporate



EXHIBIT 4

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)
			Direct %	Total %	Source	Date	
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I =	100.00	100.00	CB	11/2020	-
Name	No of employees						
MR DELYAN SLAVCHEV PEEVSKI	▶						-

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

Shareholders history**Current shareholders**

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	100.00	100.00	CB	11/2020	-	-
			100.00	100.00	CB	03/2020		
			100.00	100.00	CB	09/2019		
			100.00	100.00	CB	03/2019		
			100.00	100.00	CB	09/2018		
			100.00	100.00	CB	03/2018		
			100.00	100.00	CB	09/2017		

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

Previous shareholders

There is no data available for this entity.

Filters



EXHIBIT 4

Shareholders: All
All information since 01/2002

Shareholders by T-Rank

Name	Country	Type	T-rank (%)	Distance	Raw data	
					Direct (%)	Total (%)
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	100.00	1	100.00	

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

I = One or more named individuals or families

Filters

All shareholders
T-Rank threshold 5%
Sorted by T-rank percentage

Shareholder power & coalitions

Most influential shareholders

Name	Country	Type	Distance	Influence power (%)
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	1	100.0

Possible controlling coalitions

Controlling coalitions do not apply because there is a shareholder with enough influence power to control the result of a vote in the company: MR DELYAN SLAVCHEV PEEVSKI.

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

I One or more named individuals or families

Current subsidiaries

Name	Country	Type	Ownership		Status	Info		Op. Rev. (in USD)
			Direct %	Total %		Source	Date	
BM SYSTEMS EAD	BG	C	-	100.00	100.00	-	CB 11/2020	0
INT INVEST EOOD	BG	C	=	100.00	100.00	-	CB 11/2020	n.a.



EXHIBIT 4

Name	No of employees
BM SYSTEMS EAD	n.a.
INT INVEST EOOD	n.a.

Name	Country	Type	Ownership		Status	Info		Op. Rev. (m USD)	
			Direct %	Total %		Source	Date		
INTTRAFIK EOOD	BG	C	=	100.00	100.00	-	CB	11/2020	1
NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE	IT	F	=	100.00	100.00	-	HO	07/2019	0
REAL ESTATES INT LTD EOOD	BG	C	=	100.00	100.00	-	CB	11/2020	0
▶ TELEGRAPH MEDIA EOOD	BG	C	=	100.00	100.00	-	CB	11/2020	14
TELEGRAPH NEWSPAPER LTD EOOD	BG	C	=	100.00	100.00	-	CB	11/2020	n.a.

Name	No of employees
INTTRAFIK EOOD	38
NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE	1
REAL ESTATES INT LTD EOOD	n.a.
▶ TELEGRAPH MEDIA EOOD	190
TELEGRAPH NEWSPAPER LTD EOOD	n.a.

Legend

C = Corporate

F = Financial company

Mergers & acquisitions

Date	Headline
25/04/2020	Nyu Imidzh Bulgaria to acquire stake in Telegraf Media from Intrast (deal no. 1941072429)

Filters

Deals: M&A deals

Period: Last year

Corporate: For the company

Sources : Bureau van Dijk

Research

Company profiles

Filters:

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData



EXHIBIT 4

No data available for this company

Industry profiles

Source	Document	Type	Date
MarketLine Company operates in the industry	Global Real Estate	Industry profile	09/06/2020
	Global Real Estate		20/06/2019
	Global Real Estate		11/04/2018
	Global Real Estate		26/05/2017
	Global Real Estate		26/05/2017
	Global Real Estate		25/07/2016
	Global Real Estate		05/11/2015
	Global Real Estate		01/06/2014
	Global Real Estate		01/06/2014
	Global Real Estate		01/03/2009
	Global Real Estate		01/04/2008
	Global Real Estate		01/03/2007
	Global Real Estate		01/04/2006
	Global Real Estate		01/05/2005
	Global Real Estate		01/08/2004
Global Real Estate		01/12/2003	
MarketLine Company operates in the industry	Real Estate in Europe	Industry profile	09/06/2020
	Real Estate in Europe		20/06/2019
	Real Estate in Europe		11/04/2018
	Real Estate in Europe		26/05/2017
	Real Estate in Europe		26/05/2017
	Real Estate in Europe		25/07/2016

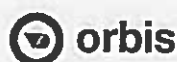


EXHIBIT 4

Real Estate in Europe	05/11/2015
Real Estate in Europe	01/06/2014
Real Estate in Europe	01/06/2014

Industry profiles Filters

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

My variables

Unconsolidated, Local registry filing
No data available for this company

Appendix – Omitted chapters

The chapters listed below have been omitted because they have no data for this company, or the data cannot be represented in the PDF

Public tenders
Detailed format
Cash flow statement
Segment data - Business lines
Segment data - Geographic segments
Graph - company ratings over time
Albatross score by Zanders
Compass score merchant risk by G2
RepRisk indicators by RepRisk
National scores
Stock profile
Annual stock data
Annual stock valuation
Pricing series
Beta and price volatility
Earnings estimates
Additional estimates
Brokers recommendations
Bonds and loans
Credit default swaps
Current auditors, bankers & other advisors
Previous auditors, bankers & other advisors
Branches
Innovation strength
Patent portfolio
Royalties agreements
Company and market news
FACTIVA news
Crossborder investments
Liquidity events & potential beneficiaries
Local registry documents
aRMadillo
Global reports
EOL SEC filings

Exhibit 5 Withheld in Full

Bates: GLOMAG-23653 0179-0181

12/15/2020

Intrust EAD - SeeNews - Business intelligence for Southeast Europe

EXHIBIT 6



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Intrust EAD

Summary

Company ID (NIN)
204589733

Company owner / manager
Delian Slavchev Peevski

Country
Bulgaria

Capital
4,000,000

Total assets
67,953,000

Net profit for the period
30,761,000

Report year
2019

Currency
BGN

Industry
Construction/Real Estate

General information

About Intrust EAD

Intrust EAD is a Bulgarian company engaged in the purchase and sale of own real estate.
Last updated on Feb 6, 2020.

Meta info

Status
Active

Legal form
Joint Stock Company

Incorporation date
May 12, 2017

NIN
204589733/MAG-23653 0182

12/15/2020

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EXHIBIT 6

Tickers

Stock Exchange

ISIN

Profile last updated

Feb. 6, 2020, 8:35 p.m.

Alternative names

Intrust JSC

Intrust PLC

History

May 12, 2017 - Intrust EAD is established in Sofia, the capital of Bulgaria.

Apr 25, 2018 - Intrust EAD signs a preliminary contract for the sale of 50% of its subsidiary Telegraph Media EOOD to the Bulgaria-based company Nu Image Bulgaria EAD.

Oct 10, 2018 - Intrust EAD withdraws from the sale of Telegraph Media EOOD.

Jan 1, 2019 - Intrust EAD takes over the local companies NSN Investment EOOD, Prestrafik EOOD and Developments EOOD, which no longer exist as separate legal entities.

Mar 11, 2019 - The company takes over Zair 2009 EOOD.

Last updated on Feb 6, 2020.

Related data

Similar companies

Related reports

Industry Report

Automotive industry in SEE 2020

Macro Report

Bulgaria Economy Report Q3 2019

12/15/2020

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Management

Executive Board

Aleksadur Kirilov Georgiev

CEO

Board of Directors

Violeta Getova Dimitrova

Member of the Board

Dora Hristova Spasova

Member of the Board

Aleksadar Kirilov Georgiev

Member of the Board

Contacts

Address

119, Ekzarh Yosif Str.
1527
Sofia, Bulgaria

Telephones

N/A

Fax

N/A

Emails

N/A

Websites

N/A

Ownership

GLOMAG-23653 0184

https://seenews.com/companies/company_profile/intrust-ead-613464#ownership

12/15/2020

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Name	Direct holding	Indirect holding	Owner type	Country
Delian Slavchev Peevski	100.0		Individual	

Subsidiaries and affiliates

Name	Direct holding	Indirect holding	Country
Telegraph Media EOOD	100.0		Bulgaria
Prestrafik EOOD	100.0		Bulgaria

Products and services

Intrust EAD is engaged in investment and commercial activities, real estate transactions and brokerage.

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12/15/2020

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**BM SYSTEMS EAD**

SOFIA, Bulgaria

Active

Private

BvD ID n° BG131382912

The Global Ultimate Owner of this controlled subsidiary is MR DELYAN SLAVCHEV PEEVSKI

Key information

EKZARH YOSIF, 119

1000 SOFIA

Bulgaria

☎ +359 9801737

Activity:

Corporate, Business Services

Date of incorporation:

2007

Turnover for 2013

\$ 0.00

Net income for 2013

\$ -2.11 th

Ownership

1 shareholder

0 subsidiary

10 companies in the corporate group

PEPs and sanctions

~~This company is not the same~~
or similar to a risk relevant name



EXHIBIT 7

Financial profile

Unconsolidated, Local registry filing

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12 months	12 months	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317
Operating revenue (Turnover)	0	n.a.	0 =	0 =	0
P/L before tax	-2,114	n.a.	-3,756 ↘	2,020 ↗	0
P/L for period [=Net income]	-2,114	n.a.	-3,756 ↘	2,020 ↗	0
Total assets	133,897 ↗	81,558 ↘	91,647 ↗	10,101 ↗	7,238
Shareholders funds	31,008 ↘	31,680 ↘	36,058 ↗	10,101 ↗	7,238
Current ratio (x)	0.49 ↗	0.03 =	0.03	n.s.	n.s.
ROE using P/L before tax (%)	-6.82	n.a.	-10.42 ↘	20.00 ↗	0.00
ROCE using P/L before tax (%)	n.a.	n.a.	-6.25	n.a.	n.a.
Solvency ratio (Asset based) (%)	23.16 ↘	38.84 ↘	39.34 ↘	100.00 =	100.00
Number of employees	n.a.	n.a.	1 =	1	n.a.

Management

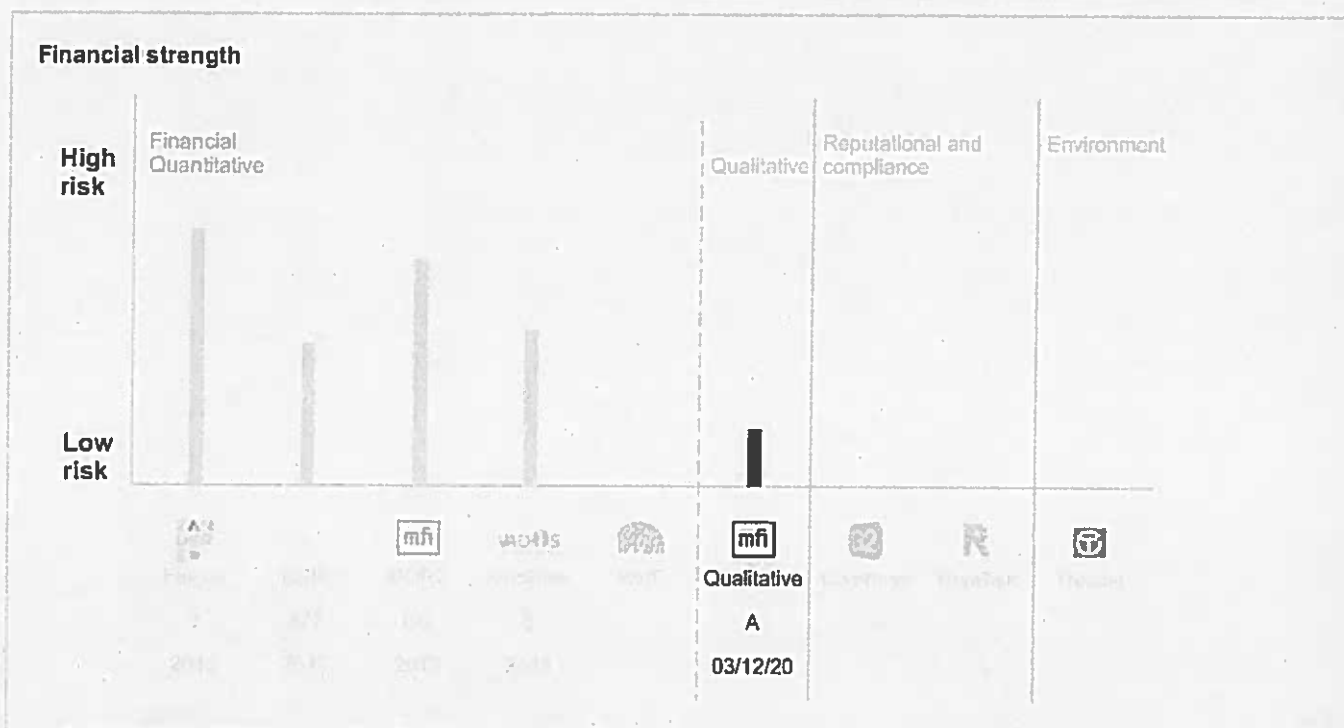
Mr Aleksandar Kirilov Georgiev

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Contact

Contact information

EKZARH YOSIF, 119
1000 SOFIA
Bulgaria

+359 9801737

+359 29804880

Oblast

Sofia City

NUTS1

BG4 - Southwestern and South-Central Bulgaria

NUTS2

BG41 - Yugozapaden

NUTS3

BG412 - Sofia City

Industry & activities

Type of entity: Corporate
 BvD sector: Business Services
 NACE Rev. 2 main section: N - Administrative and support service activities

NACE Rev. 2 code(s)
 Core code: 8299 Other business support service activities nec
 Primary code(s): 8299 Other business support service activities nec
 Secondary code(s): 7311 Advertising agencies
 7312 Media representation

NAICS 2017 code(s) {derived from NACE Rev. 2 codes}
 Core code: 5614 Business Support Services
 Primary code(s): 561499 All Other Business Support Services
 Secondary code(s): 541810 Advertising Agencies
 541840 Media Representatives



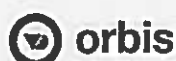


EXHIBIT 7

541850	Outdoor Advertising
541860	Direct Mail Advertising
541870	Advertising Material Distribution Services
541890	Other Services Related to Advertising

US SIC code(s) {derived from NACE Rev. 2 codes}

Core code:	738	Miscellaneous business services
Primary code(s):	7389	Business services, not elsewhere classified
Secondary code(s):	7311	Advertising agencies
	7313	Radio, television, and publishers' advertising representatives
	7319	Advertising, not elsewhere classified

Identifiers

BvD ID number	BG131382912
BvD account number	BG131382912U
BvD9 number	016767057
UIC (Trade register number)	131382912
European VAT number	BG131382912
TIN (TIN)	131382912

Legal Information

Active

One-person public limited company - EAD
Incorporated in 2007
Corporate

PEPs and sanctions



This company is not the same or similar to a risk relevant name

Accounting information

Information for this record is provided by Creditreform Bulgaria (last delivery: 29/11/2020)

No Recent financials available

Most recent accounts:	2013
Available in Orbis since	08/2014
Types of account:	No recent Unconso.
Available for:	5 years

Accounts published in:	BGN
Closing date:	31/12/2013
Filing type:	Local registry filing
Accounting template:	Corporate

Available account

31/12/2013 Unconsolidated, Local registry filing

Key indicators based on Unconsolidated, Local registry filing





EXHIBIT 7

Turnover for 2013

\$ 0.00



Legal events

Date	Type	Description	Source
28/08/2007	Registration	Registered with the Court in Sofia	Registry Agency (BULSTAT register)
10/08/2007	Registration	VAT registration	Registry Agency (BULSTAT register)
2007	Registration	Founded as AD (Public Limited Company)	Registry Agency (BULSTAT register)

Key financials & employees

Unconsolidated, Local registry filing

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12-months	12-months	12-months	12-months	12-months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317
L Operating revenue (Turnover)	0	n.a.	0	0	0
L P/L before tax	-2,114	n.a.	-3,756	2,020	0
L P/L for period [=Net income]	-2,114	n.a.	-3,756	2,020	0
L Cash flow	n.a.	n.a.	n.a.	n.a.	n.a.
L Total assets	133,897	81,558	91,647	10,101	7,238
L Shareholders funds	31,008	31,680	36,058	10,101	7,238
L Current ratio (x)	0.49	0.03	0.03	n.s.	n.s.
L Profit margin (%)	n.s.	n.a.	n.s.	n.s.	n.s.
L ROE using P/L before tax (%)	-6.82	n.a.	-10.42	20.00	0.00
L ROCE using P/L before tax (%)	n.a.	n.a.	-6.25	n.a.	n.a.
L Solvency ratio (Asset based) (%)	23.16	38.84	39.34	100.00	100.00
L Number of employees	n.a.	n.a.	1	1	n.a.

Global standard format





EXHIBIT 7

Unconsolidated, Local registry filing

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12 months	12 months	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317

Balance sheet

Assets

Fixed assets	83,862	80,210	90,144	0	0
L Intangible fixed assets	0	0	0	0	0
L Tangible fixed assets	83,862	80,210	90,144	0	0
L Other fixed assets	0	0	0	0	0
Current assets	50,035	1,348	1,502	10,101	7,238
L Stock	0	0	0	0	0
L Debtors	705	674	751	0	0
L Other current assets	49,331	674	751	10,101	7,238
L Cash & cash equivalent	49,331	674	751	6,061	6,032
Total assets	133,897	81,558	91,647	10,101	7,238

Liabilities & equity

Shareholders funds	31,008	31,680	36,058	10,101	7,238
L Capital	35,236	33,702	37,560	8,081	7,238
L Other shareholders funds	-4,228	-2,022	-1,502	2,020	0
Non-current liabilities	0	0	0	0	0
L Long term debt	0	0	0	0	0
L Other non-current liabilities	0	0	0	0	0
L Provisions	0	0	0	0	0
Current liabilities	102,889	49,879	55,589	0	0
L Loans	0	0	0	0	0
L Creditors	0	0	0	0	0
L Other current liabilities	102,889	49,879	55,589	0	0
Total shareh. funds & liab.	133,897	81,558	91,647	10,101	7,238





EXHIBIT 7

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12 months	12 months	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317

Memo lines

L Working capital	-49,331	-674	-751	-6,061	-6,032
L Net current assets	-52,854	-48,531	-54,087	10,101	7,238
L Enterprise value	n.a.	n.a.	n.a.	n.a.	n.a.
L Number of employees	n.a.	n.a.	1	1	n.a.

Profit & loss account

L Operating revenue (Turnover)	0	n.a.	0	0	0
L Sales	0	n.a.	0	0	0
L Costs of goods sold	n.a.	n.a.	n.a.	n.a.	n.a.
L Gross profit	n.a.	n.a.	n.a.	n.a.	n.a.
L Other operating expenses	n.a.	n.a.	n.a.	n.a.	n.a.
L Operating P/L [=EBIT]	-2,114	n.a.	-3,756	-673	-1,206
L Financial P/L	0	n.a.	0	2,694	1,206
L Financial revenue	0	n.a.	1,502	2,694	1,206
L Financial expenses	0	n.a.	1,502	0	0
L P/L before tax	-2,114	n.a.	-3,756	2,020	0
L Taxation	0	n.a.	0	0	0
L P/L after tax	-2,114	n.a.	-3,756	2,020	0
L Extr. and other P/L	0	n.a.	0	0	0
L Extr. and other revenue	0	n.a.	0	0	0
L Extr. and other expenses	0	n.a.	0	0	0
L P/L for period [=Net income]	-2,114	n.a.	-3,756	2,020	0

Memo lines

L Export revenue	n.a.	n.a.	n.a.	n.a.	n.a.
L Material costs	n.a.	n.a.	n.a.	n.a.	n.a.
L Costs of employees	n.a.	n.a.	n.a.	n.a.	n.a.





EXHIBIT 7

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12 months	12 months	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317
L Depreciation & Amortization	n.a.	n.a.	n.a.	n.a.	n.a.
L Other operating items	2,114	n.a.	3,756	673	1,206
L Interest paid	n.a.	n.a.	1,502	n.a.	n.a.
L Research & Development expenses	n.a.	n.a.	n.a.	n.a.	n.a.
L Cash flow	n.a.	n.a.	n.a.	n.a.	n.a.
L Added value	n.a.	n.a.	n.a.	n.a.	n.a.
L EBITDA	n.a.	n.a.	n.a.	n.a.	n.a.

Global ratios

Unconsolidated, Local registry filing

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12 months	12 months	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317

Profitability ratios

L ROE using P/L before tax (%)	-6.82	n.a.	-10.42	20.00	0.00
L ROCE using P/L before tax (%)	n.a.	n.a.	-6.25	n.a.	n.a.
L ROA using P/L before tax (%)	-1.58	n.a.	-4.10	20.00	0.00
L ROE using Net income (%)	-6.82	n.a.	-10.42	20.00	0.00
L ROCE using Net income (%)	n.a.	n.a.	-6.25	n.a.	n.a.
L ROA using Net income (%)	-1.58	n.a.	-4.10	20.00	0.00
L Profit margin (%)	n.s.	n.a.	n.s.	n.s.	n.s.
L Gross margin (%)	n.a.	n.a.	n.a.	n.a.	n.a.
L EBITDA margin (%)	n.a.	n.a.	n.a.	n.a.	n.a.
L EBIT margin (%)	n.s.	n.a.	n.s.	n.s.	n.s.
L Cash flow / Operating revenue (%)	n.a.	n.a.	n.a.	n.a.	n.a.





EXHIBIT 7

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12 months	12 months	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317
L Enterprise value / EBITDA (x)	n.a.	n.a.	n.a.	n.a.	n.a.
L Market cap / Cash flow from operations (x)	n.a.	n.a.	n.a.	n.a.	n.a.

Operational ratios

L Net assets turnover (x)	n.s.	n.a.	n.s.	n.s.	n.s.
L Interest cover (x)	n.a.	n.a.	-2.50	n.a.	n.a.
L Stock turnover (x)	n.s.	n.a.	n.s.	n.s.	n.s.
L Collection period (days)	n.s.	n.a.	n.s.	n.s.	n.s.
L Credit period (days)	n.s.	n.a.	n.s.	n.s.	n.s.
L Export revenue / Operating revenue (%)	n.a.	n.a.	n.a.	n.a.	n.a.
L R&D expenses / Operating-revenue-(%)	n.a.	n.a.	n.a.	n.a.	n.a.

Structure ratios

L Current ratio (x)	0.49	0.03	0.03	n.s.	n.s.
L Liquidity ratio (x)	0.49	0.03	0.03	n.s.	n.s.
L Shareholders liquidity ratio (x)	n.s.	n.s.	n.s.	n.s.	n.s.
L Solvency ratio (Asset based) (%)	23.16	38.84	39.34	100.00	100.00
L Solvency ratio (Liability based) (%)	30.14	63.51	64.87	n.s.	n.s.
L Gearing (%)	0.00	0.00	0.00	0.00	0.00

Per employee ratios

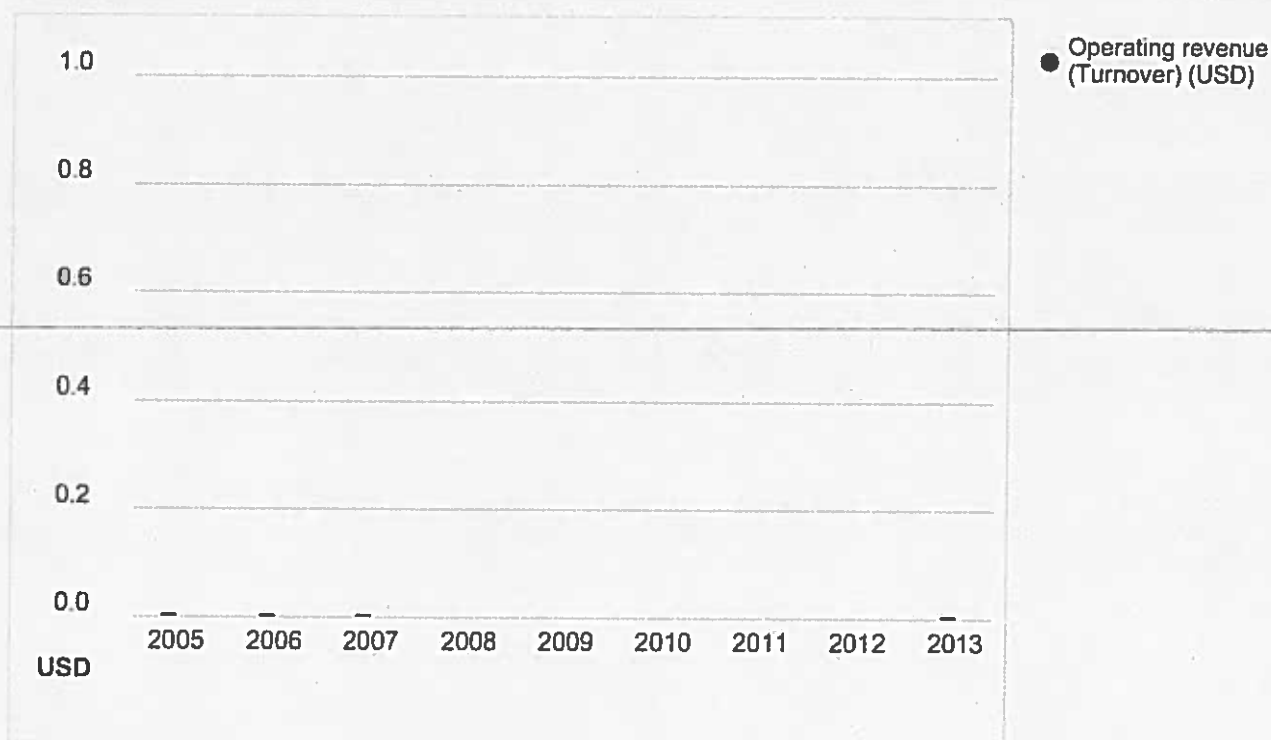
L Profit per employee (th)	n.a.	n.a.	-4	2	n.a.
L Operating revenue per employee (th)	n.a.	n.a.	n.s.	n.s.	n.a.
L Costs of employees / Operating revenue (%)	n.a.	n.a.	n.a.	n.a.	n.a.
L Average cost of employee (th)	n.a.	n.a.	n.a.	n.a.	n.a.



EXHIBIT 7

	31/12/2013	31/12/2012	31/12/2007	31/12/2006	31/12/2005
	USD	USD	USD	USD	USD
	12 months	12 months	12 months	12 months	12 months
	Local GAAP	Local GAAP	Local GAAP	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.70472	0.67404	0.75120	0.67340	0.60317
L Shareholders funds per employee (th)	n.a.	n.a.	36	10	n.a.
L Working capital per employee (th)	n.a.	n.a.	-1	-6	n.a.
L Total assets per employee (th)	n.a.	n.a.	92	10	n.a.

Graph - Value over time



Graph - Indices of several values over time

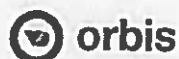
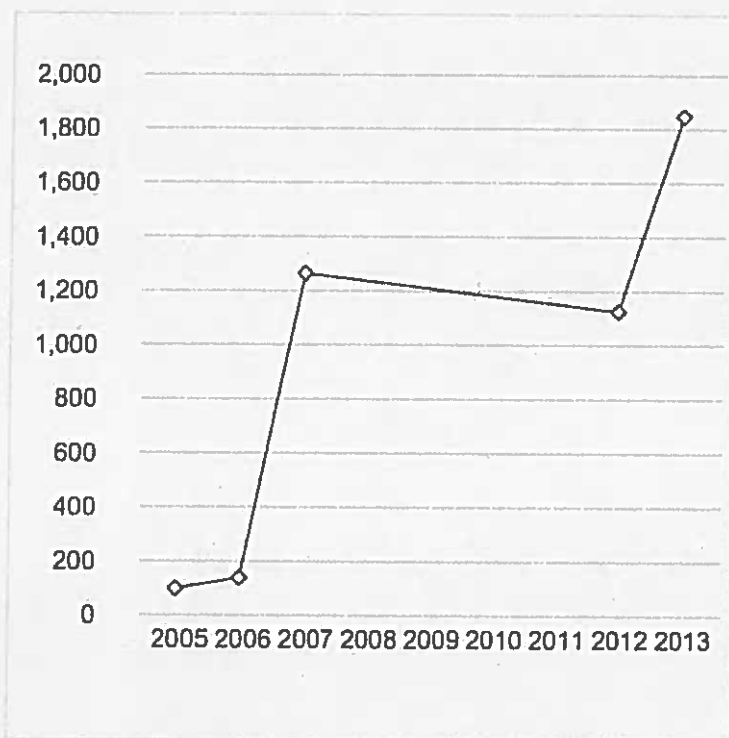


EXHIBIT 7



Base: 2005

◆ Total assets (th USD)

7.24

Peer comparison

Accounting year: Peer group year	Year	Operating revenue (Turnover) th USD		P/L before tax th USD	
Median		0		-2	
Standard deviation		0		114	
Average		0		-49	

KAVANCH TEKS OOD	2013	0	1	16	1
RAMSTORE BULGARIA EAD	2013	0	1	-35	8
BRAVO 21 OOD	2013	0	1	-2	5
YUVA YURA TODOROVA ET	2013	0	1	-4	7
SENSA EAD	2013	0	1	1	3
TSVETEN DEKOR EOOD	2013	0	1	0	4
KOOP YUG KOMERS EOOD	2013	0	1	11	2
CITS PLS EOOD	2013	0	1	-78	10
AST-LOGISTICS LTD OOD	2013	0	1	-49	9
PRINT INVEST 1 EOOD	2013	0	1	-397	11
BM SYSTEMS EAD	2013	0	1	-2	5



EXHIBIT 7

Accounting year: Peer group year	Year	P/L for period [=Net income] th USD	Total assets th USD
Median		-4	224
Standard deviation		113	9,845
Average		-51	4,121

KAVANCH TEKS OOD	2013	14	1	120	7
RAMSTORE BULGARIA EAD	2013	-35	8	4,763	2
BRAVO 21 OOD	2013	-1	4	12	10
YUVA YURA TODOROVA ET	2013	-4	6	n.a.	
SENSA EAD	2013	1	3	40	8
TSVETEN DEKOR EOOD	2013	-21	7	20	9
KOOP YUG KOMERS EOOD	2013	11	2	315	5
CITS PLS EOOD	2013	-78	10	1,684	3
AST-LOGISTICS LTD OOD	2013	-49	9	761	4
PRINT INVEST 1 EOOD	2013	-397	11	33,359	1
BM SYSTEMS EAD	2013	-2	5	134	6

Accounting year: Peer group year	Year	Shareholders funds th USD	Number of employees
Median		26	1
Standard deviation		1,548	1
Average		-589	2

KAVANCH TEKS OOD	2013	63	3	1	3
RAMSTORE BULGARIA EAD	2013	-5,126	10	n.a.	
BRAVO 21 OOD	2013	11	7	n.a.	
YUVA YURA TODOROVA ET	2013	n.a.		2	2
SENSA EAD	2013	39	4	n.a.	
TSVETEN DEKOR EOOD	2013	20	6	n.a.	
KOOP YUG KOMERS EOOD	2013	315	1	n.a.	
CITS PLS EOOD	2013	115	2	3	1
AST-LOGISTICS LTD OOD	2013	-455	8	1	3
PRINT INVEST 1 EOOD	2013	-906	9	1	3
BM SYSTEMS EAD	2013	31	5	n.a.	

Peer group definition



EXHIBIT 7

Closest 10 international companies according to the Operating revenue (Turnover) of the subject company for the last available year (2013) amongst the standard peer group.
 The standard peer group is based on NACE Rev. 2 Industry classification: 8299 - Other business support service activities nec.

Company ratings

No data available for this company

Country ratings

Your subscription does not include some of the agency ratings.

EIU

	Rating	Date	Action/Direction	Outlook	Watch
Overall country rating	BBB	01/09/2020			
Banking sector rating	BB	01/09/2020		Stable	

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Financial strength summary

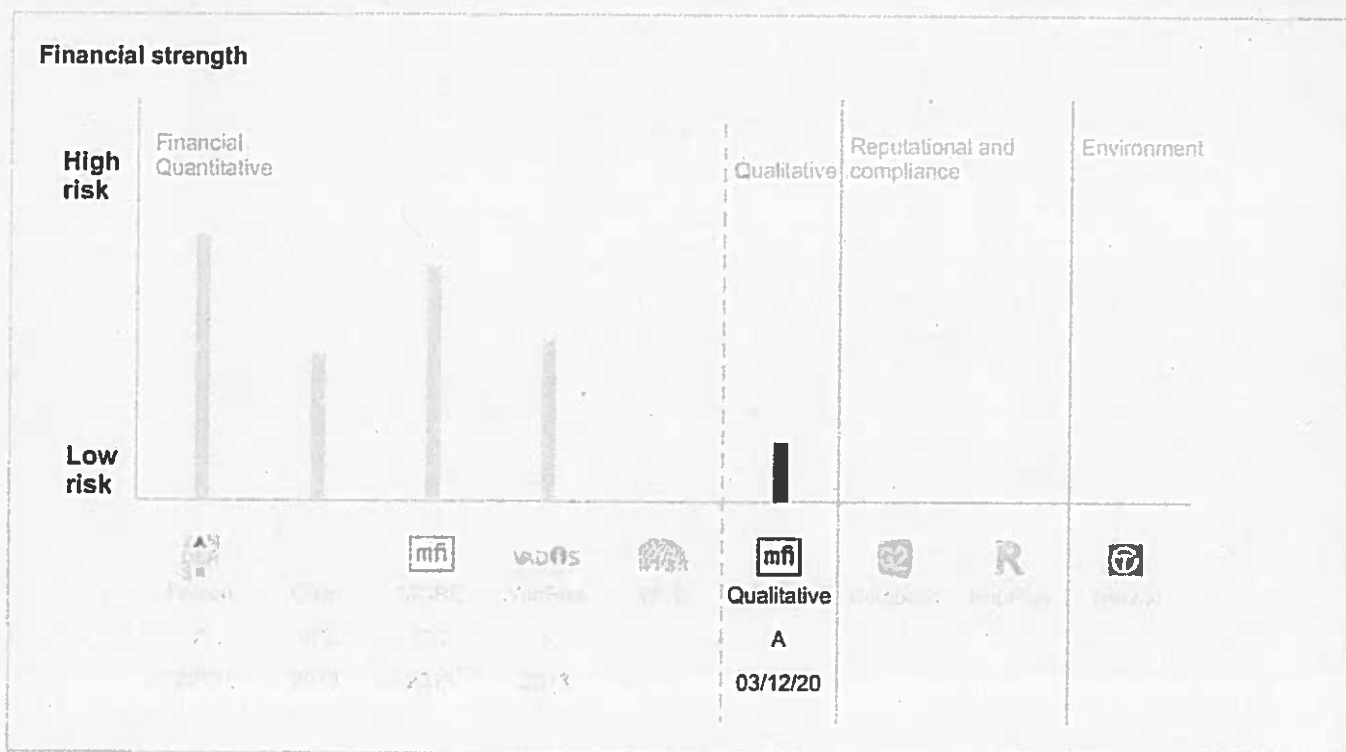
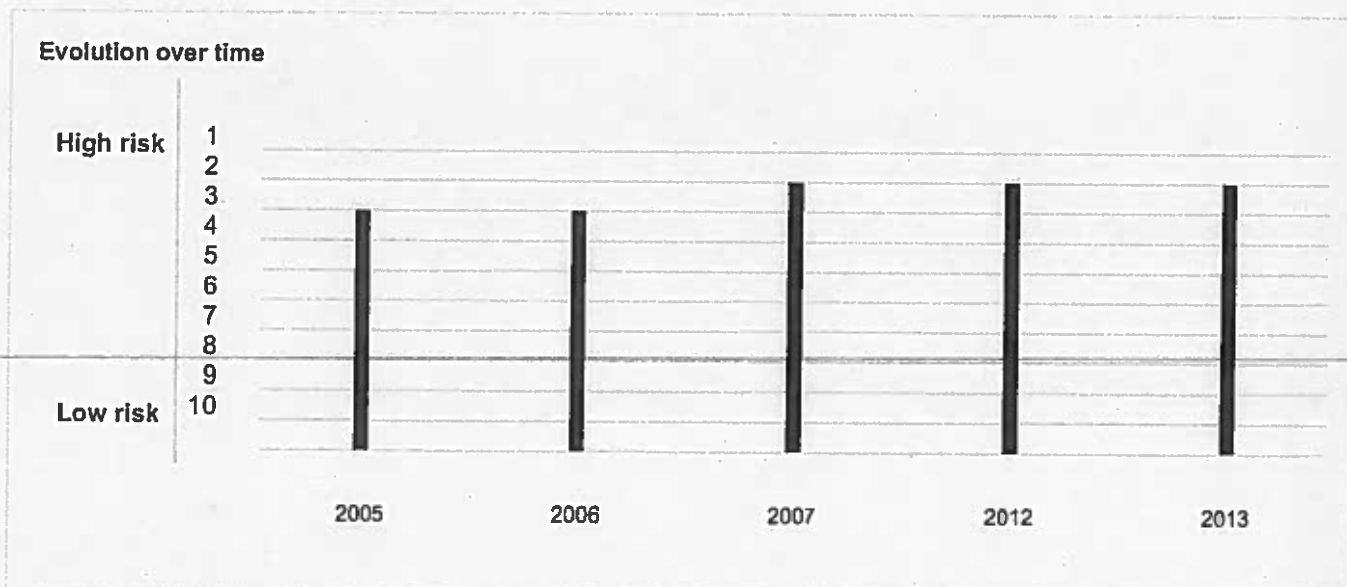
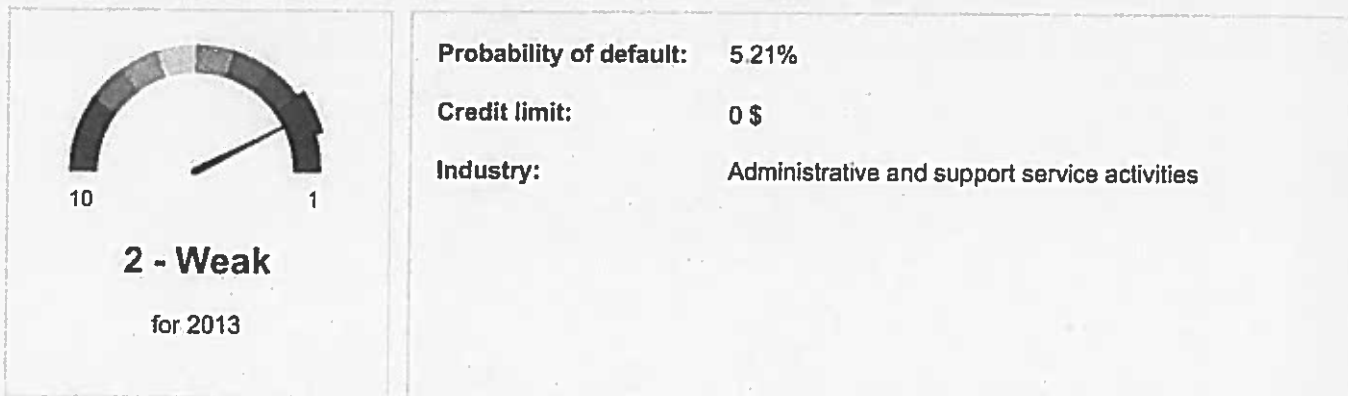




EXHIBIT 7

Falcon counterparty risk score by Zanders



Evolution over time (Tabular view)

	2005	2006	2007	2012	2013
Counterparty Risk Score (CRS)	3	3	2	2	2
Probability of default (%)	2.75	2.75	5.21	5.21	5.21
Falcon credit limit (\$)	0	0	0	0	0

Observations

- 2013** Original currency is not EUR
- 2012** Original currency is not EUR
- 2007** Original currency is not EUR
- 2006** Original currency is not EUR
The credit limit could not consider Turnover figures.
- 2005** Original currency is not EUR
The credit limit could not consider Turnover figures.



EXHIBIT 7

Falcon influencing ratios

	2005	2006	2007	2012	2013
Operations and Liquidity					
Turnover growth	2	0	0	2	2
Return on sales	0	0	0	2	0
Current ratio	10	10	0	0	2
Debtor days	2	0	0	2	0
Debt services					
Interest coverage ratio	2	2	0	2	2
Debt/EBITDA	2	2	2	2	2
Capital structure					
Gearing	6	6	6	6	6
Solvency	10	10	6	6	6
Tangible net worth	2	2	2	2	2

Financial stability score by CRIF Decision Solutions Ltd



572
for 2013

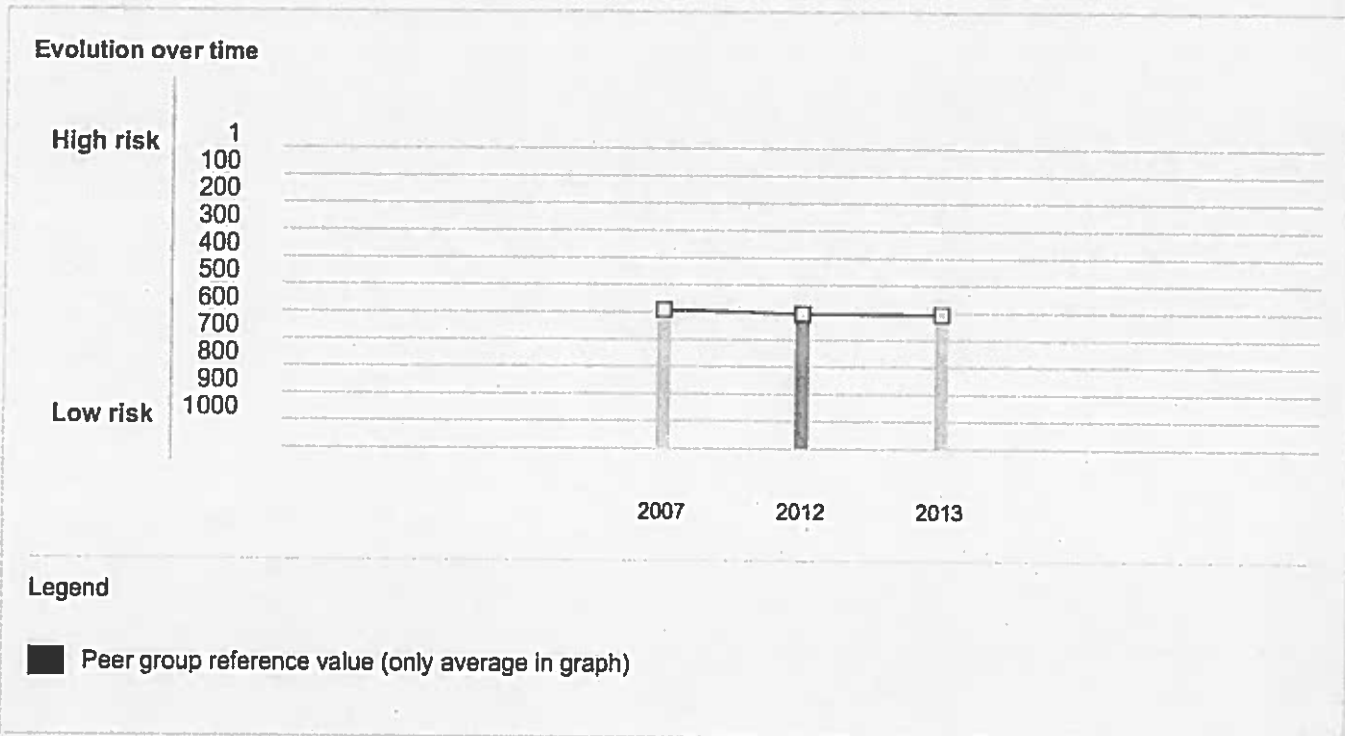
Key influencing factors - Asset management efficiency
- Financial leverage

Scores for peer group 275 Minimum
591 Average
770 Maximum

Industry Other business support service activities nec



EXHIBIT 7



Evolution over time (Tabular view)

	2007	2012	2013
Company	552	629	572
Key factors	- Asset management efficiency - Financial leverage	- Asset management efficiency - Financial leverage	- Asset management efficiency - Financial leverage
Peer group			
Minimum	275	257	272
Average	591	605	606
Maximum	770	770	770

MORE credit risk score by modeFinance

CC - Risky
for 2013

Confidence level: 86%

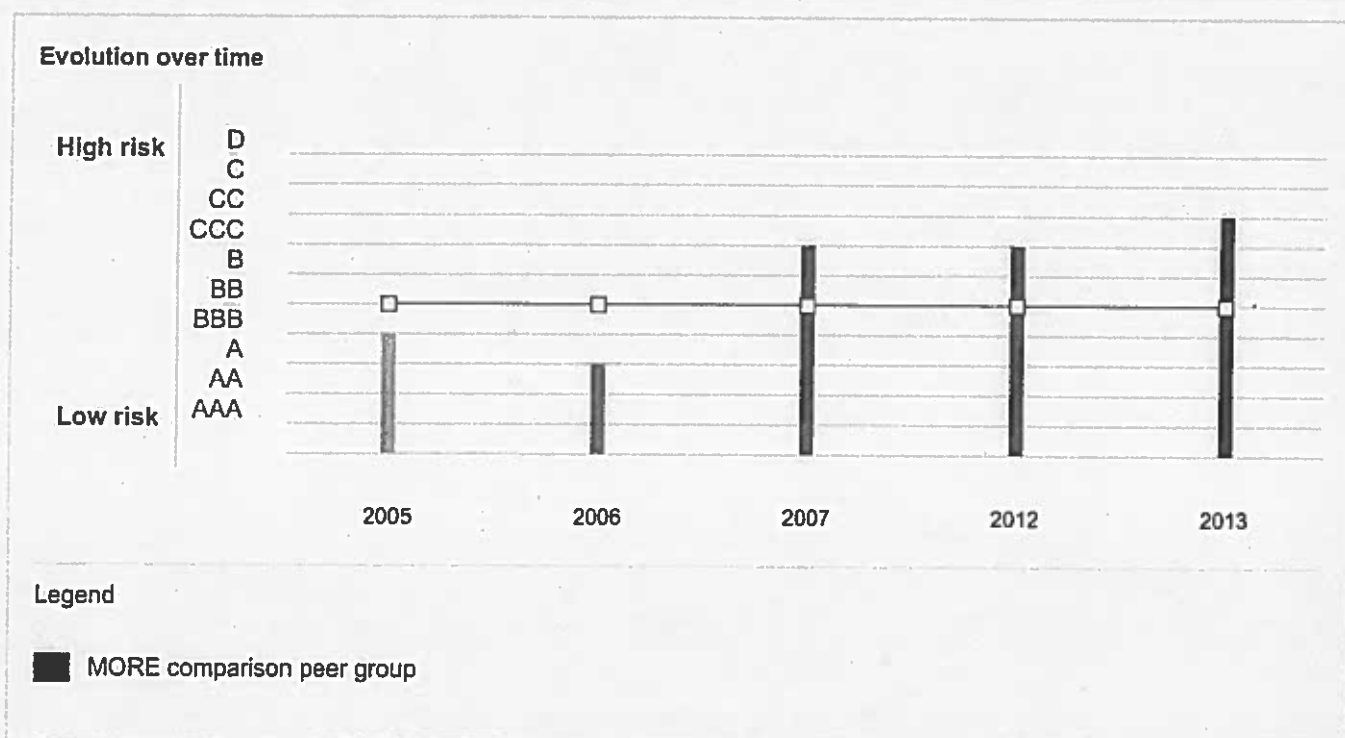
Probability of default: 37.0%

Credit limit: 0 \$

Industry: Services



EXHIBIT 7



Evolution over time (Tabular view)

	2005	2006	2007	2012	2013
Score					
Company	BBB	A	CCC	CCC	CC
Peer group	BB	BB	BB	BB	BB
Probability of default (%)					
Company	0.85	0.35	21.00	13.00	37.00
Peer group	2.40	2.20	1.50	2.40	2.40
Confidence level (%)					
Company	75	75	75	52	86
Credit limit (\$)					
Company	n.a.	n.a.	n.a.	n.a.	0.00



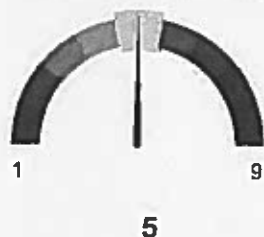
EXHIBIT 7

MORE influencing ratios

	2005	2006	2007	2012	2013
Solvency ratios					
Leverage ratio	AAA	AAA	BBB	A	BB
Assets to debt	AAA	AAA	BBB	A	BB
Financial ratio					
Fixed assets coverage ratio	BBB	BBB	CC		
Liquidity ratios					
Current ratio				D	CC
Quick ratio				D	B
Cash conversion cycle (CCC)				A	C
Profitability and economic ratios					
Return on investment (ROI)		AAA	CC		CC
Return on equity (ROE)		AA	D		D
Asset turnover					D
Interest coverage ratio					
Interest paid coverage					D

Predictive Indicators by Vadis

Propensity of bankruptcy



Risk of bankruptcy higher than national average

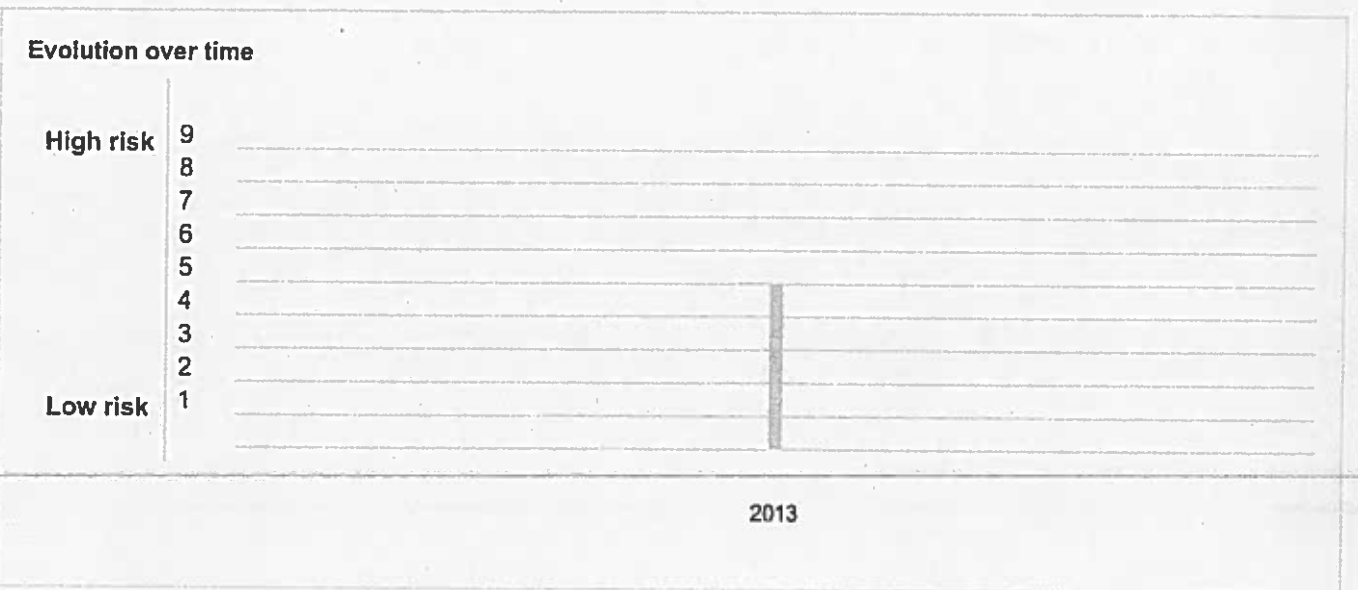
for 2013

Key influencing factors:

- Evolution of other current liabilities
- + Evolution of loans / current liabilities
- + Evolution of costs of goods sold
- + Evolution of current ratio
- Other current liabilities



EXHIBIT 7



Evolution over time (Tabular view)

	2007	2013
Propensity of bankruptcy	n.a.	5
Key influencing factors		<ul style="list-style-type: none"> — Evolution of other current liabilities + Evolution of loans / current liabilities + Evolution of costs of goods sold + Evolution of current ratio — Other current liabilities

Albatross score by Zanders



EXHIBIT 7



4 - Below average risk

on 03/12/2020

Observation

The company receives the Albatross score because a Falcon score older than 3 years is available.

Qualitative score by modeFinance



A - Good

on 03/12/2020

Confidence level: 55.0%

Credit limit: **5,984 \$**
Based on company size and on geographical and sector statistics.

Note that a MORE credit limit older than 3 years is available. A Qualitative credit limit based on latest available information has been calculated.

Key influencing factors: A - GUO MORE score / status
D - Directors average MORE score / status
B - Size of the GUO

Industry score: C

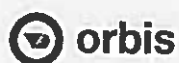
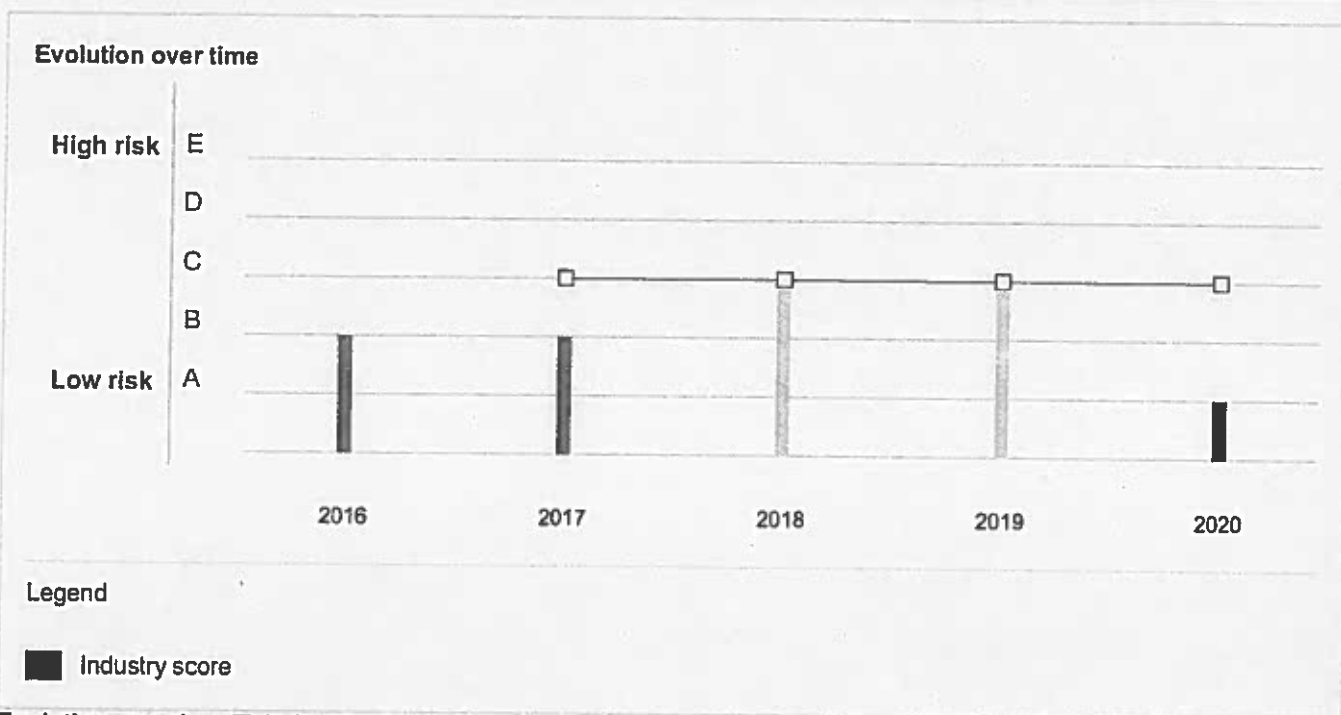


EXHIBIT 7

**Evolution over time (Tabular view)**

	2016	2017	2018	2019	03/12/2020
Qualitative score	B	B	C	C	A
Confidence level (%)	43	45	18	18	55
Credit limit (th \$)	n.a.	6	6	6	6
Industry score	n.a.	C	C	C	C

Credit limit annotations

03/12/2020	Based on company size and on geographical and sector statistics. Note that a MORE credit limit older than 3 years is available. A Qualitative credit limit based on latest available information has been calculated.
2019	Based on company size and on geographical and sector statistics. Note that a MORE credit limit older than 3 years is available. A Qualitative credit limit based on latest available information has been calculated.
2018	Based on company size and on geographical and sector statistics. Note that a MORE credit limit older than 3 years is available. A Qualitative credit limit based on latest available information has been calculated.
2017	Based on company size and on geographical and sector statistics. Note that a MORE credit limit older than 3 years is available. A Qualitative credit limit based on latest available information has been calculated.

Managed funds

There is no available data for this entity set

Current directors & managers



EXHIBIT 7

Boards & committees 2

Boards of directors

MS VIOLETA GETOVA DIMITROVA Member of the Board	CB
MS ZHANA DIMITROVA KUTSEVA Member of the Board ✓ Also shareholder	CB

Management & staff 1

Senior Management

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director	CB
---	----

Source

CB: Creditreform (Bulgaria)

Filters

Formal sources

Bodies & departments

Previous directors & managers

Boards & committees 4 | 1 ▶

Boards of directors 1 ▶

MR MIROSLAV LASLO BORSHOSH Executive director and chairman of the board (from 28/02/2005)	CB
MR ALEKSANDAR KIRILOV GEORGIEV Executive Director and Chairman of the Board	CB
MS IRENA ANGELOVA KRASTEVA Executive Director and Chairman of the Board	CB ▶
MS ZHANA DIMITROVA KUTSEVA Executive Director and Chairman of the Board (from 24/08/2007) ✓ Also shareholder	CB

Management & staff 4 | 1 ▶

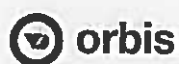


EXHIBIT 7

Senior Management

1 ▶

MR MIROSLAV LASLO BORSHOSH Executive director and chairman of the board (from 28/02/2005)	CB	
MR ALEKSANDAR KIRILOV GEORGIEV Executive Director and Chairman of the Board	CB	
MS IRENA ANGELOVA KRASTEVA Executive Director and Chairman of the Board	CB	▶
MS ZHANA DIMITROVA KUTSEVA Executive Director and Chairman of the Board (from 24/08/2007) ✓ Also shareholder	CB	

Legend

▶ There are names that are the same, or similar to, a risk relevant name

Source

CB:Creditreform (Bulgaria)

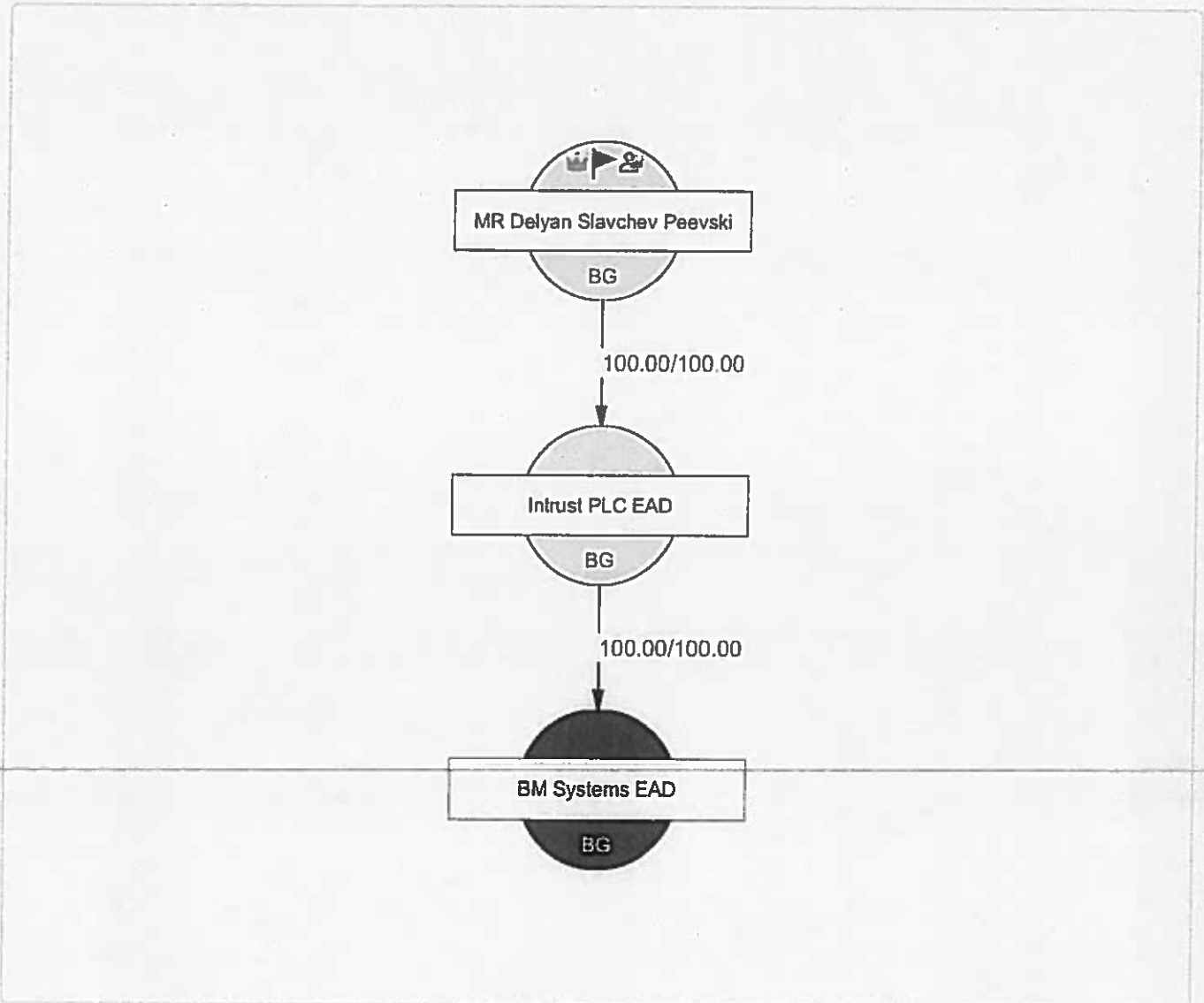
Filters

Formal sources

Bodies & departments

Ownership structure

Graph : Shareholders



1 shareholder and the controlling shareholder path are represented.

Legend

















- | | | | |
|---|--|---|--|
|  | Controlling shareholder |  | Direct / Total ownership % |
|  | An individual |  | Branch |
|  | Beneficial Owner |  | 50% + 1 Share |
|  | Global Ultimate Owner |  | Calculated total percentage |
|  | There are names that are the same, or similar to, a risk relevant name |  | Director/Manager |
| | |  | Foreign company |
| | |  | General partner |
| | |  | Jointly owned, = 50 % |
| | |  | Majority owned, > 50% |
| | |  | Not available |
| | |  | Negligible, <=0.01% |
| | | | Beneficial Owner from register, = 100% |



EXHIBIT 7

T	Sole trader, = 100 %
VE	Vessel
WO	Wholly owned, >= 98%

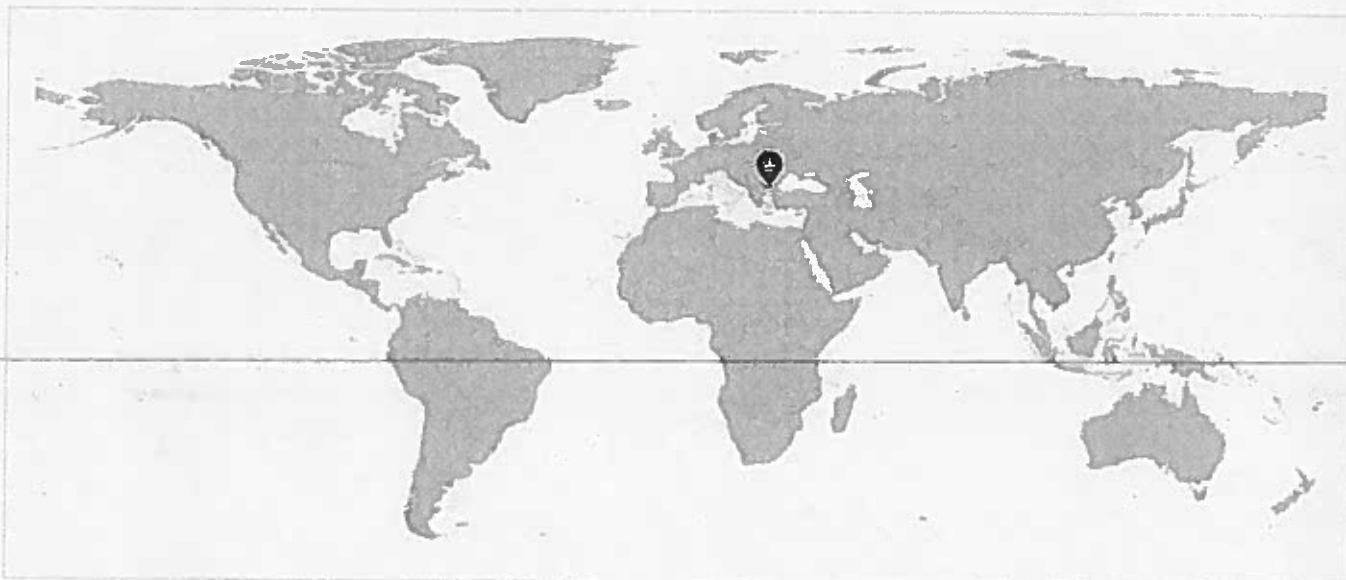
Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Geographic footprint

Number of companies in the corporate group per country



The map represents the geographic location of the companies in the corporate group

All 10 companies in the corporate group are represented

Legend

Number of entities by country

- More than 1
- Less than 1

Country of both the company and the GUO

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Corporate group



EXHIBIT 7

There are 10 companies in the corporate group

Name	Country	Ownership		Level of own.	Info Source
		Direct %	Total %		

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	▶	BG				
----------------------------	---	----	--	--	--	--

Ultimately owned subsidiaries

INT LTD EOOD	▶	BG	100.00	100.00	1	CB
▼ INTRUST PLC EAD		BG	100.00	100.00	1	CB
L BM SYSTEMS EAD		BG	100.00	100.00	2	CB
L INT INVEST EOOD		BG	100.00	100.00	2	CB
L INTTRAFIK EOOD		BG	100.00	100.00	2	CB
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE		IT	100.00	100.00	2	HO
L REAL ESTATES INT LTD EOOD		BG	100.00	100.00	2	CB
▶ TELEGRAPH MEDIA EOOD		BG	100.00	100.00	2	CB
L TELEGRAPH NEWSPAPER LTD EOOD		BG	100.00	100.00	2	CB

Name

Date

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	▶	
----------------------------	---	--

Ultimately owned subsidiaries

INT LTD EOOD	▶	11/2020
▼ INTRUST PLC EAD		11/2020
L BM SYSTEMS EAD		11/2020
L INT INVEST EOOD		11/2020
L INTTRAFIK EOOD		11/2020
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE		07/2019
L REAL ESTATES INT LTD EOOD		11/2020
▶ TELEGRAPH MEDIA EOOD		11/2020
L TELEGRAPH NEWSPAPER LTD EOOD		11/2020

Legend

▶ There are names that are the same, or similar to, a risk relevant name

Ultimate Owner definition





The path from the company to its Ultimate Owner is minimum 50.01%



EXHIBIT 7

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.



Beneficial Owners

Beneficial Owner (1)					
	MR DELYAN SLAVCHEV PEEVSKI Bulgaria	Distance: 2			
Name		Country	Ownership Direct %	Ownership Total %	Source
MR DELYAN SLAVCHEV PEEVSKI		BG	100.00	100.00	CB 11/2020
INTRUST PLC EAD		BG	100.00	100.00	CB 11/2020
BM SYSTEMS EAD		BG			
Other Ultimate Beneficiary (0)					
This company has no Other Ultimate Beneficiaries.					

Beneficial Owner from register (0)

There are no Beneficial Owners from register for this company

Legend

-  There are names that are the same, or similar to, a risk relevant name
-  Has enough influence power to control the result of a vote in the company

Beneficial Owner definition

The minimum percentage of ownership at first level is 10.00%, the minimum percentage at further levels is 50.01%.

I also consider any individual at the top of a path who has an unknown percentage of ownership (% such as '>x%' are considered unknown)

I also consider any individual at the top of a path who has a percentage of minimum 10.00% (with the requested 50.01% at all other levels).

Beneficial Owners from register are not subject to the defined thresholds.

Controlling shareholders



EXHIBIT 7

BvD independence indicator

**D - Direct majority ownership**

Has an identified shareholder with over 50% direct ownership or is a branch/foreign company

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)
			Direct %	Total %	Source	Date	
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	100.00	100.00	CB	11/2020	-
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22
BM SYSTEMS EAD	BG	C					0

Name	No of employees
MR DELYAN SLAVCHEV PEEVSKI	▶ -
INTRUST PLC EAD	29
BM SYSTEMS EAD	n.a.

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

C = Corporate

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees	
			Direct %	Total %	Source	Date			
INTRUST PLC EAD	BG	C	-	100.00	100.00	CB	11/2020	22	29

Legend

C = Corporate

Shareholders history

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22	29



EXHIBIT 7

Legend

C = Corporate

Previous shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)			
			Direct %	Total %	Source	Date				
MRS ZHANA DIMITROVA KUTSEVA	BG	I	50.00	n.a.	CB	08/2020	-			
			50.00	n.a.	CB	04/2020				
			50.00	n.a.	CB	10/2019				
			50.00	n.a.	CB	04/2019				
			50.00	n.a.	CB	10/2018				
			50.00	n.a.	CB	04/2018				
			50.00	n.a.	CB	10/2017				
			50.00	n.a.	CB	04/2017				
			50.00	n.a.	CB	09/2016				
BALKAN MEDIA COMPANY EAD	BG	C	50.00	n.a.	CB	10/2017	1			
			50.00	n.a.	CB	04/2017				
			50.00	n.a.	CB	09/2016				
MR MIROSLAV LASLO BORSHOSH	BG	I	50.00	n.a.	CB	08/2016	-			
			50.00	n.a.	CB	07/2016				
			50.00	n.a.	CB	01/2016				
			50.00	n.a.	CB	07/2015				
			50.00	n.a.	CB	01/2015				
			50.00	n.a.	CB	07/2014				
			50.00	n.a.	CB	10/2013				
			50.00	n.a.	CB	08/2013				
			50.00	n.a.	CB	02/2013				
			50.00	n.a.	CB	03/2009				
			50.00	n.a.	CB	02/2008				
			100.00	100.00	CB	11/2007				
			100.00	100.00	CB	10/2006				
			SMALL SHAREHOLDERS	-	L	50.00	n.a.	CB	08/2016	-
						50.00	n.a.	CB	07/2016	
50.00	n.a.	CB				01/2016				
50.00	n.a.	CB				07/2015				
50.00	n.a.	CB				01/2015				
50.00	n.a.	CB				07/2014				
50.00	n.a.	CB				10/2013				
50.00	n.a.	CB				08/2013				
50.00	n.a.	CB				02/2013				
50.00	n.a.	CB				03/2009				
50.00	n.a.	CB	02/2008							



EXHIBIT 7

Name	No of employees
MRS ZHANA DIMITROVA KUTSEVA	-
BALKAN MEDIA COMPANY EAD	15
MR MIROSLAV LASLO BORSHOSH	-
SMALL SHAREHOLDERS	-

Legend

I = One or more named individuals or families

C = Corporate

L = Other unnamed shareholders, aggregated

Filters

Shareholders: All

All information since 01/2002



EXHIBIT 7

Shareholders by T-Rank

Name	Country	Type	T-rank (%)	Distance	Raw data	
					Direct (%)	Total (%)
INTRUST PLC EAD	n.a.	C	100.00	1	100.00	
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	100.00	2		

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

C = Corporate

I = One or more named individuals or families

Filters

All shareholders

T-Rank threshold 5%

Sorted by T-rank percentage

Shareholder power & coalitions

Most influential shareholders

Name	Country	Type	Distance	Influence power (%)
INTRUST PLC EAD	n.a.	C	1	100.0
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	2	100.0

Possible controlling coalitions

Controlling coalitions do not apply because there is a shareholder with enough influence power to control the result of a vote in the company: MR DELYAN SLAVCHEV PEEVSKI.

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

C Corporate

I One or more named individuals or families

Research

Company profiles

Filters:

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

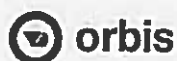


EXHIBIT 7

No data available for this company

Industry profiles

Source	Document	Type	Date
MarketLine Company operates in the industry	Global Newspapers	Industry profile	22/05/2020
	Global Newspapers		15/02/2019
	Global Newspapers		10/04/2018
	Global Newspapers		29/03/2017
	Global Newspapers		31/07/2016
	Global Newspapers		09/06/2015
	Global Newspapers		01/05/2014
	Global Newspapers		01/02/2013
	Global Newspapers		01/07/2011
		Global Newspapers	
	Global Newspapers		01/08/2009
	Global Newspapers		01/08/2008
	Global Newspapers		01/07/2007
	Global Newspapers		01/08/2006
	Global Newspapers		01/12/2005
	Global Newspapers		01/03/2004
	Global Newspapers		26/02/2020
MarketLine Company operates in the industry	Newspapers in Europe	Industry profile	22/05/2020
	Newspapers in Europe		15/02/2019
	Newspapers in Europe		10/04/2018
	Newspapers in Europe		29/03/2017
	Newspapers in Europe		31/07/2016



EXHIBIT 7

	Newspapers in Europe		09/06/2015
	Newspapers in Europe		01/05/2014
	Newspapers in Europe		01/02/2013
	Newspapers in Europe		01/07/2011
	Newspapers in Europe		01/07/2010
	Newspapers in Europe		01/08/2009
	Newspapers in Europe		01/08/2008
	Newspapers in Europe		01/07/2007
	Newspapers in Europe		01/08/2006
	Newspapers in Europe		01/12/2005
	Newspapers in Europe		01/03/2004
MarketLine Company operates in the industry	Global Advertising	Industry profile	20/04/2020
	Global Advertising		20/02/2019
	Global Advertising		06/04/2018
	Global Advertising		27/03/2017
	Global Advertising		13/06/2016
	Global Advertising		01/03/2015
	Global Advertising		01/03/2014
	Global Advertising		01/03/2014
	Global Advertising		01/10/2012
	Global Advertising		01/10/2011
	Global Advertising		01/07/2010
	Global Advertising		01/11/2009
	Global Advertising		01/11/2008
	Global Advertising		01/10/2007
	Global Advertising		01/12/2006



EXHIBIT 7

	Global Advertising		01/10/2005
	Global Advertising		01/05/2005
	Global Advertising		01/08/2004
	Global Advertising		01/12/2003
MarketLine Company operates in the industry	Advertising in Europe	Industry profile	20/04/2020
	Advertising in Europe		20/02/2019
	Advertising in Europe		06/04/2018
	Advertising in Europe		27/03/2017
	Advertising in Europe		13/06/2016
	Advertising in Europe		01/03/2015
	Advertising in Europe		01/03/2014
	Advertising in Europe		01/03/2014
	Advertising in Europe		01/10/2012
	Advertising in Europe		01/10/2011
	Advertising in Europe		01/07/2010
	Advertising in Europe		01/11/2009
	Advertising in Europe		01/11/2008
	Advertising in Europe		01/10/2007
	Advertising in Europe		01/12/2006
	Advertising in Europe		01/10/2005
	Advertising in Europe		01/11/2004
	Advertising in Europe		01/12/2003
MarketLine Company operates in the industry	Global Digital Advertising	Industry profile	03/04/2020
MarketLine Company operates in the industry	Digital Advertising in Europe	Industry profile	03/04/2020
MarketLine Company operates in the industry	Global Media	Industry profile	03/12/2019

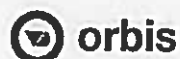


EXHIBIT 7

	Global Media		07/04/2018
	Global Media		30/08/2017
	Global Media		24/08/2016
	Global Media		21/10/2015
	Global Media		01/06/2014
	Global Media		01/04/2013
	Global Media		01/01/2012
	Global Media		01/09/2010
	Global Media		01/12/2009
	Global Media		01/10/2008
	Global Media		01/12/2007
	Global Media		01/12/2006
	Global Media		01/12/2005
	Global Media		01/05/2005
	Global Media		01/08/2004
	Global Media		01/12/2003
MarketLine Company operates in the industry	Media in Europe	Industry profile	03/12/2019
	Media in Europe		07/04/2018
	Media in Europe		30/08/2017
	Media in Europe		24/08/2016
	Media in Europe		21/10/2015
	Media in Europe		01/06/2014
	Media in Europe		01/04/2013
	Media in Europe		01/01/2012
	Media in Europe		01/09/2010
	Media in Europe		01/12/2009



EXHIBIT 7

Media in Europe	01/10/2008
Media in Europe	01/12/2007
Media in Europe	01/12/2006
Media in Europe	01/12/2005
Media in Europe	01/12/2003

Industry profiles Filters

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

My variables

Unconsolidated, Local registry filing
No data available for this company

Appendix – Omitted chapters

The chapters listed below have been omitted because they have no data for this company, or the data cannot be represented in the PDF

Public tenders
Detailed format
Cash flow statement
Segment data - Business lines
Segment data - Geographic segments
Graph - company ratings over time
Global score by WVB
Compass score merchant risk by G2
RepRisk indicators by RepRisk
Environmental score by Trucost
National scores
Stock profile
Annual stock data
Annual stock valuation
Pricing series
Beta and price volatility
Earnings estimates
Additional estimates
Brokers recommendations
Bonds and loans
Credit default swaps
Current auditors, bankers & other advisors
Previous auditors, bankers & other advisors
Current subsidiaries
Branches
Innovation strength
Patent portfolio
Royalties agreements
Company and market news
FACTIVA news
Mergers & acquisitions
Crossborder investments



EXHIBIT 7

Liquidity events & potential beneficiaries
Local registry documents
aRMadillo
Global reports
EOL SEC filings

Exhibit 8 Withheld in Full

Bates: GLOMAG-23653 0225-0226



EXHIBIT 9

**INT INVEST EOOD**

SOFIA, Bulgaria

Active

Private

BvD ID n° BG205535941

The Global Ultimate Owner of this controlled subsidiary is MR DELYAN SLAVCHEV PEEVSKI

Key information

EKZARH YOSIF, 119

1000 SOFIA

Bulgaria

Activity:

Corporate

Date of incorporation:

2019

Turnover

No financial information available

Net income

No financial information available

Ownership

1 shareholder

0 subsidiary

10 companies in the corporate group

PEPs and sanctions

This company is not the same or similar to a risk relevant name

Financial profile No financial information available**Management**

Mr Aleksandar Kirilov Georgiev

News stories since last year

0 negative stories

0 stories in total

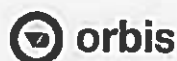
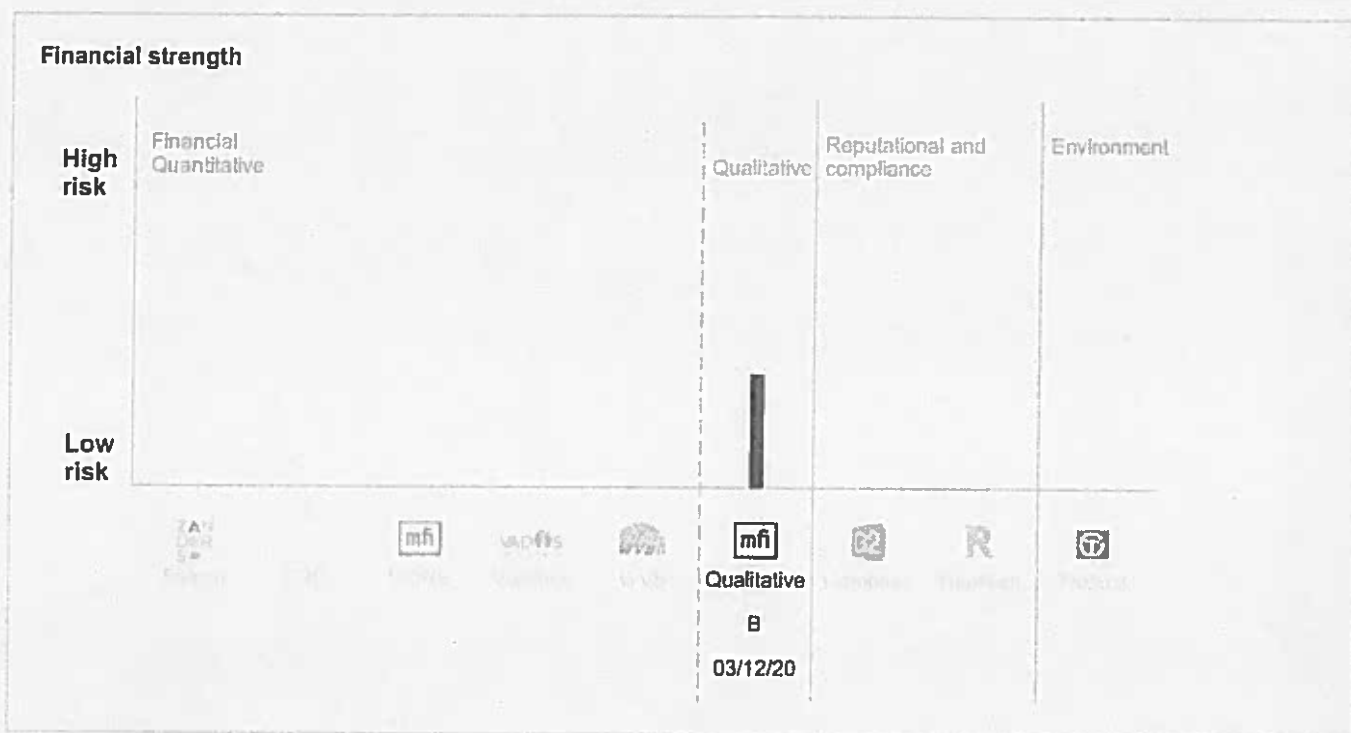


EXHIBIT 9



Contact

Contact information

EKZARH YOSIF, 119
1000 SOFIA
Bulgaria

Oblast

Sofia City

NUTS1

BG4 - Southwestern and South-Central Bulgaria

NUTS2

BG41 - Yugozapaden

NUTS3

BG412 - Sofia City

Industry & activities

Type of entity: Corporate

Identifiers

BvD ID number	BG205535941
BvD9 number	403105353
UIC (Trade register number)	205535941
European VAT number	BG205535941
TIN (TIN)	205535941

Legal information

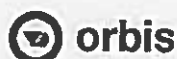


EXHIBIT 9

Active(updated in Orbis on 05/03/2019)

One-person private limited company - EOOD
Incorporated in 2019
Corporate

PEPs and sanctions

▶ This company is not the same or similar to a risk relevant name

Legal events

Date	Type	Description	Source
04/04/2019	Registration	VAT registration	Registry Agency (BULSTAT register)
22/02/2019	Registration	Founded as EOOD (one person private ltd. co.)	Registry Agency (BULSTAT register)

Key financials & employees

No financials, Local registry filing
No data available for this company

Global standard format

No financials, Local registry filing
No data available for this company

Global ratios

No financials, Local registry filing
No data available for this company

Peer comparison

The company discloses no figure for 'Operating revenue (Turnover)' in its last available accounts. Consequently, the standard peer group based on this variable is undefined.

Peer group definition

Closest 10 international companies according to the Operating revenue (Turnover) of the subject company for the last available year amongst the standard peer group.
The standard peer group is based on NACE Rev. 2 industry classification for corporate, specialisation for banks and company class for insurance companies: 0 - .

Company ratings

No data available for this company

Country ratings

Your subscription does not include some of the agency ratings.



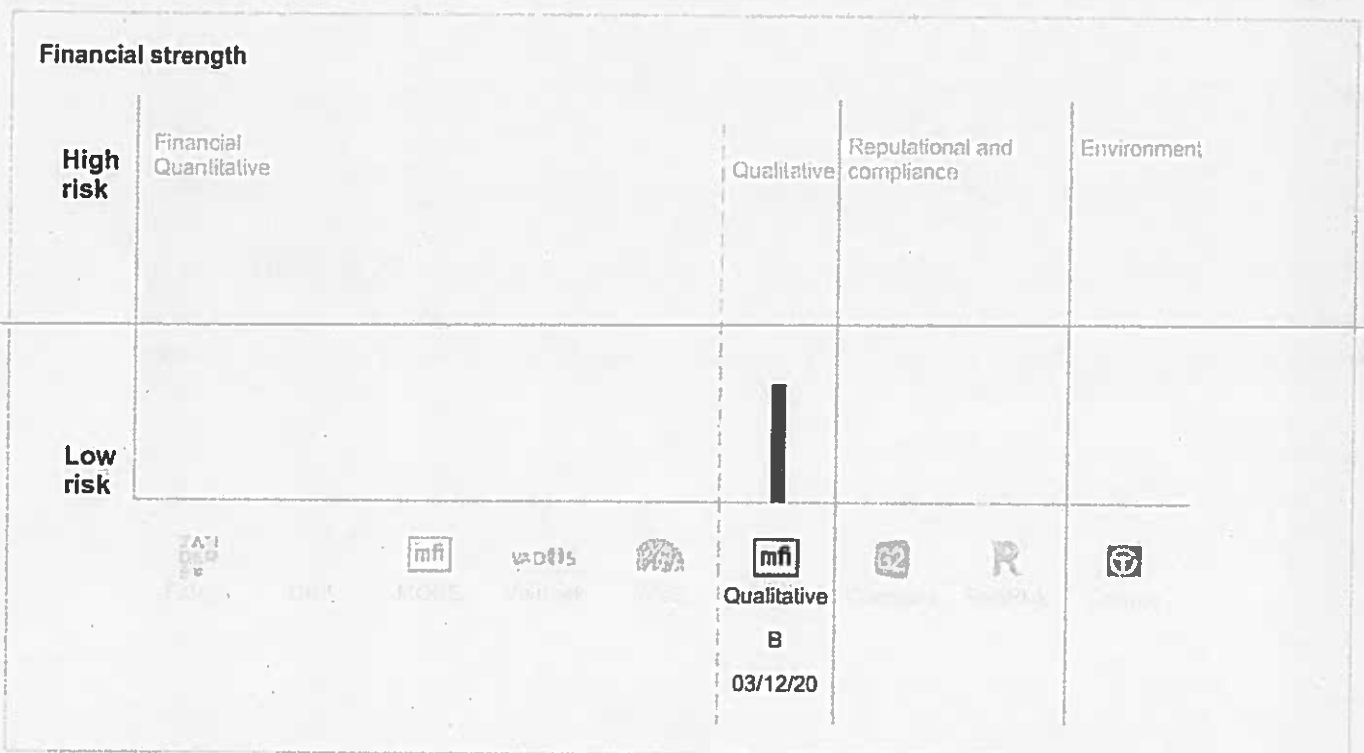
EXHIBIT 9

EIU

	Rating	Date	Action/Direction	Outlook	Watch
Overall country rating	BBB	01/09/2020			
Banking sector rating	BB	01/09/2020		Stable	

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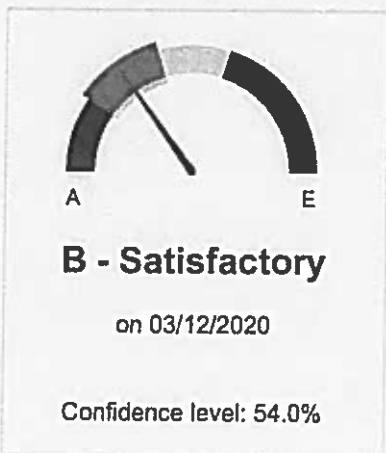
Financial strength summary



Qualitative score by modeFinance



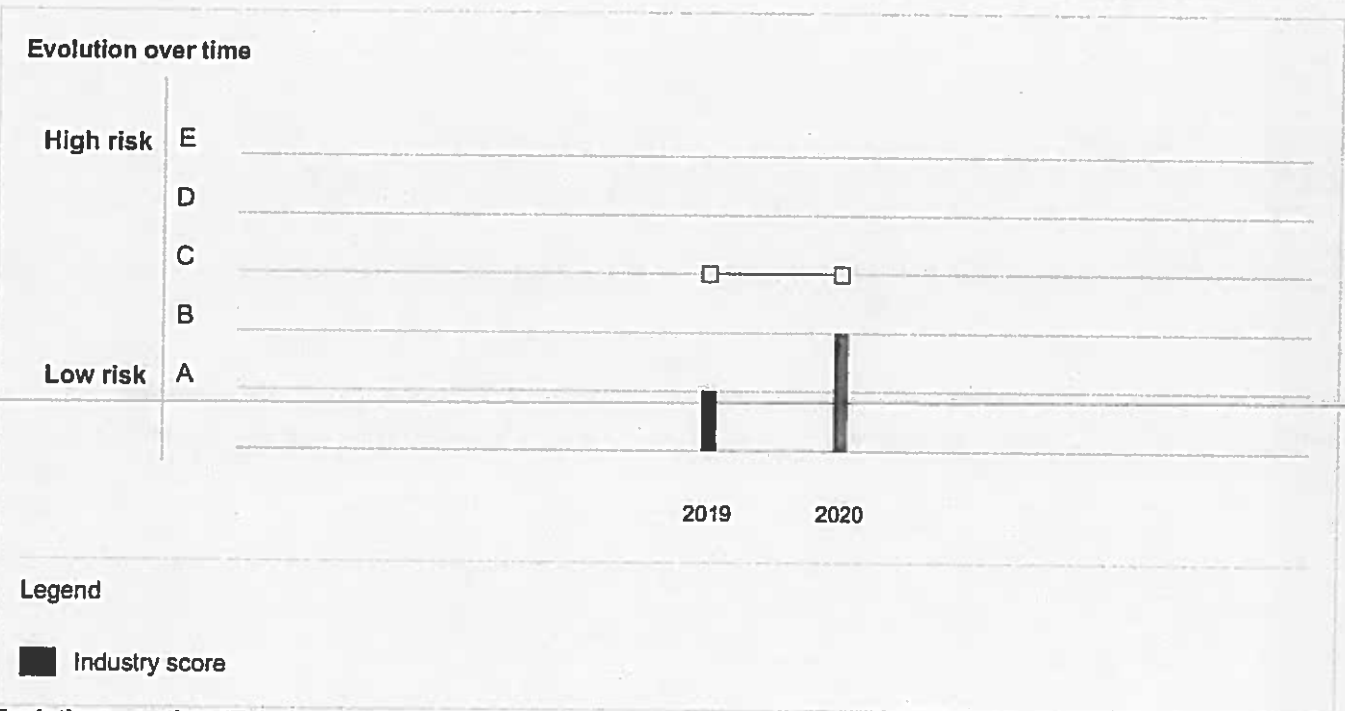
EXHIBIT 9



Credit limit: 5,984 \$
Based on geographical and sector statistics.

Key influencing factors: A - GUO MORE score / status
D - Directors average MORE score / status
B - Size of the GUO

Industry score: C



Evolution over time (Tabular view)

	2019	03/12/2020
Qualitative score	A	B
Confidence level (%)	54	54
Credit limit (th \$)	6	6
Industry score	C	C

Credit limit annotations

03/12/2020 Based on geographical and sector statistics.

2019 Based on geographical and sector statistics.

Managed funds



There is no available data for this entity set

Current directors & managers

Management & staff 1

Senior Management

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director	CB
---	----

Source

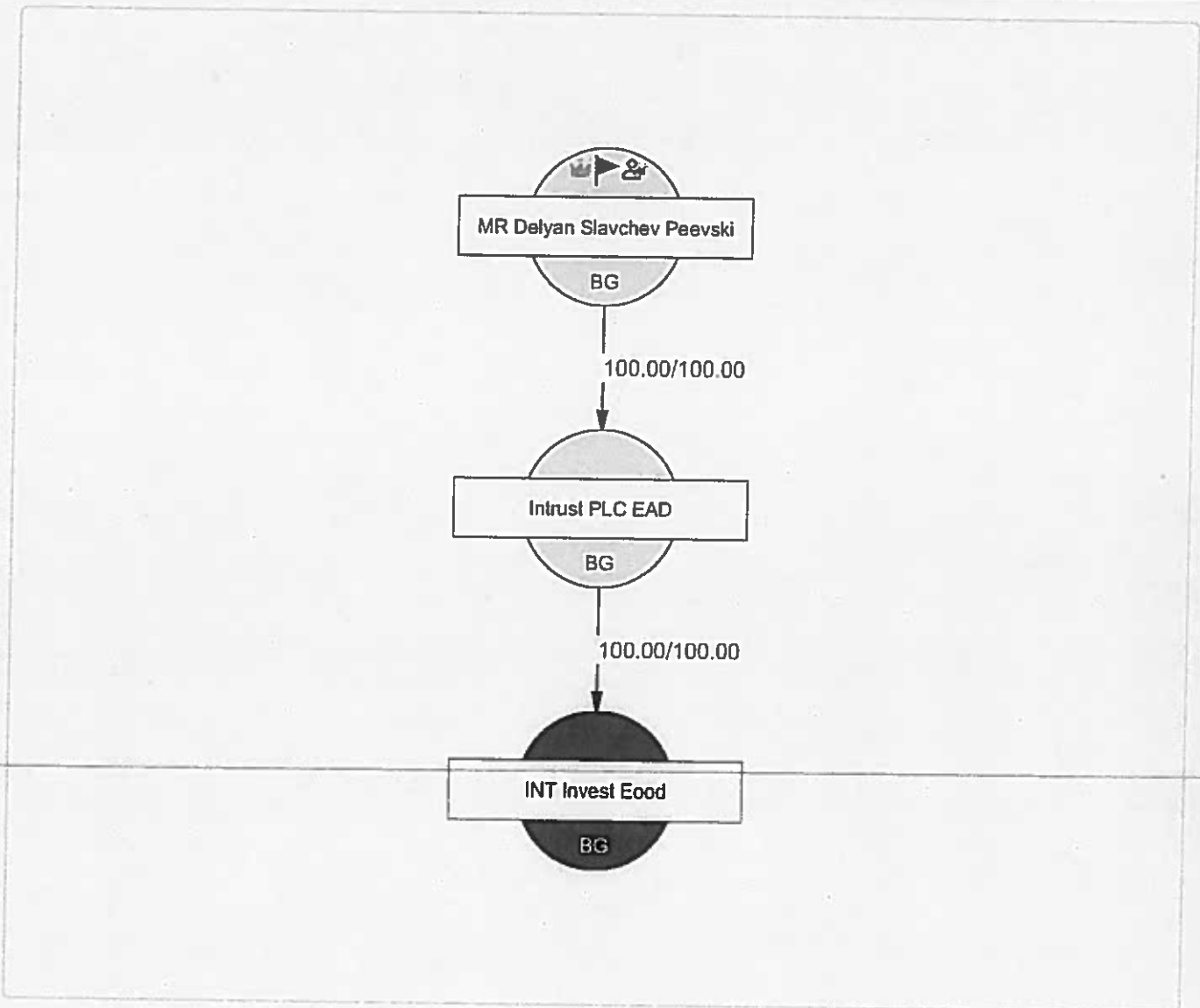
CB:Creditreform (Bulgaria)

Filters

Formal sources
Bodies & departments

Ownership structure

Graph : Shareholders



1 shareholder and the controlling shareholder path are represented.

Legend






- | | | | |
|---|--|------|--|
|  | Controlling shareholder | x/x | Direct / Total ownership % |
|  | An individual | BR | Branch |
|  | Beneficial Owner | CQP1 | 50% + 1 Share |
|  | Global Ultimate Owner | CTP | Calculated total percentage |
|  | There are names that are the same, or similar to, a risk relevant name | DM | Director/Manager |
| | | FC | Foreign company |
| | | GP | General partner |
| | | JO | Jointly owned, = 50 % |
| | | MO | Majority owned, > 50% |
| | | n.a. | Not available |
| | | NG | Negligible, <=0.01% |
| | | REG | Beneficial Owner from register, = 100% |



EXHIBIT 9

T	Sole trader, = 100 %
VE	Vessel
WO	Wholly owned, >= 98%

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Geographic footprint

Number of companies in the corporate group per country



The map represents the geographic location of the companies in the corporate group

All 10 companies in the corporate group are represented

Legend

Number of entities by country

- More than 1
- Less than 1

Country of both the company and the GUO

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Corporate group



EXHIBIT 9

There are 10 companies in the corporate group

Name	Country	Ownership		Level of own.	Info Source
		Direct %	Total %		

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	▶	BG				
----------------------------	---	----	--	--	--	--

Ultimately owned subsidiaries

INT LTD EOOD	▶	BG	100.00	100.00	1	CB
▼ INTRUST PLC EAD		BG	100.00	100.00	1	CB
L BM SYSTEMS EAD		BG	100.00	100.00	2	CB
L INT INVEST EOOD		BG	100.00	100.00	2	CB
L INTTRAFIK EOOD		BG	100.00	100.00	2	CB
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE		IT	100.00	100.00	2	HO
L REAL ESTATES INT LTD EOOD		BG	100.00	100.00	2	CB
▶ TELEGRAPH MEDIA EOOD		BG	100.00	100.00	2	CB
L TELEGRAPH NEWSPAPER LTD EOOD		BG	100.00	100.00	2	CB

Name

Date

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI



Ultimately owned subsidiaries

INT LTD EOOD	▶	11/2020
▼ INTRUST PLC EAD		11/2020
L BM SYSTEMS EAD		11/2020
L INT INVEST EOOD		11/2020
L INTTRAFIK EOOD		11/2020
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE		07/2019
L REAL ESTATES INT LTD EOOD		11/2020
▶ TELEGRAPH MEDIA EOOD		11/2020
L TELEGRAPH NEWSPAPER LTD EOOD		11/2020

Legend

▶ There are names that are the same, or similar to, a risk relevant name

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

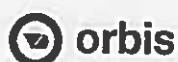






EXHIBIT 9

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.



Beneficial Owners

Beneficial Owner (1)					
	MR DELYAN SLAVCHEV PEEVSKI Bulgaria	Distance: 2			
Name		Country	Ownership Direct %	Ownership Total %	Source
MR DELYAN SLAVCHEV PEEVSKI		BG	100.00	100.00	CB 11/2020
INTRUST PLC EAD		BG	100.00	100.00	CB 11/2020
INT INVEST EOOD		BG			
Other Ultimate Beneficiary (0)					
This company has no Other Ultimate Beneficiaries.					

Beneficial Owner from register (0)

There are no Beneficial Owners from register for this company

Legend

-  There are names that are the same, or similar to, a risk relevant name
-  Has enough influence power to control the result of a vote in the company

Beneficial Owner definition

The minimum percentage of ownership at first level is 10.00%, the minimum percentage at further levels is 50.01%.

I also consider any individual at the top of a path who has an unknown percentage of ownership (% such as '>x%' are considered unknown)

I also consider any individual at the top of a path who has a percentage of minimum 10.00% (with the requested 50.01% at all other levels).

Beneficial Owners from register are not subject to the defined thresholds.

Controlling shareholders



EXHIBIT 9

BvD Independence Indicator

**D - Direct majority ownership**

Has an identified shareholder with over 50% direct ownership or is a branch/foreign company

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)
			Direct %	Total %	Source	Date	
MR DELYAN SLAVCHEV PEEVSKI	BG	I	100.00	100.00	CB	11/2020	-
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22
INT INVEST EOOD	BG	C					n.a.

Name	No of employees
MR DELYAN SLAVCHEV PEEVSKI	-
INTRUST PLC EAD	29
INT INVEST EOOD	n.a.

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

C = Corporate

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Current shareholders

Name	Country	Type		Ownership		Info		Op. Rev. (m USD)	No of employees
				Direct %	Total %	Source	Date		
INTRUST PLC EAD	BG	C	=	100.00	100.00	CB	11/2020	22	29

Legend

C = Corporate

Shareholders history

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22	29



EXHIBIT 9

Name	Country	Type	Ownership		Info		Op. Rev. (in USD)	No of employees
			Direct %	Total %	Source	Date		
			100.00	100.00	CB	03/2020		
			100.00	100.00	CB	09/2019		
			100.00	100.00	CB	03/2019		

Legend

C = Corporate

Previous shareholders

There is no data available for this entity.

FiltersShareholders: All
All information since 01/2002**Shareholders by T-Rank**

Name	Country	Type	T-rank (%)	Distance	Raw data	
					Direct (%)	Total (%)
INTRUST PLC EAD	n.a.	C	100.00	1	100.00	
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	100.00	2		

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

C = Corporate

I = One or more named individuals or families

FiltersAll shareholders
T-Rank threshold 5%
Sorted by T-rank percentage**Shareholder power & coalitions****Most influential shareholders**

Name	Country	Type	Distance	Influence power (%)
------	---------	------	----------	---------------------

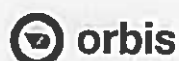


EXHIBIT 9

INTRUST PLC EAD	n.a.	C	1	100.0
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	2	100.0

Possible controlling coalitions

Controlling coalitions do not apply because there is a shareholder with enough influence power to control the result of a vote in the company: MR DELYAN SLAVCHEV PEEVSKI.

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

- C Corporate
I One or more named individuals or families

Research

Company profiles,

Filters:

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

No data available for this company

Industry profiles

No data available for this company

My variables

No financials, Local registry filing
No data available for this company

Appendix – Omitted chapters

The chapters listed below have been omitted because they have no data for this company, or the data cannot be represented in the PDF

Accounting information
Public tenders
Detailed format
Graph - Value over time
Graph - Indices of several values over time
Cash flow statement
Segment data - Business lines
Segment data - Geographic segments
Graph - company ratings over time
Falcon counterparty risk score by Zanders
Financial stability score by CRIF Decision Solutions Ltd
MORE credit risk score by modeFinance
Predictive indicators by Vadis
Global score by WVB



EXHIBIT 9

Albatross score by Zanders
Compass score merchant risk by G2
RepRisk indicators by RepRisk
Environmental score by Trucost
National scores
Stock profile
Annual stock data
Annual stock valuation
Pricing series
Beta and price volatility
Earnings estimates
Additional estimates
Brokers recommendations
Bonds and loans
Credit default swaps
Previous directors & managers
Current auditors, bankers & other advisors
Previous auditors, bankers & other advisors
Current subsidiaries
Branches
Innovation strength
Patent portfolio
Royalties agreements
Company and market news
FACTIVA news
Mergers & acquisitions
Crossborder investments
Liquidity events & potential beneficiaries
Local registry documents
aRMadillo
Global reports
EOL SEC filings

Exhibit 10 Withheld in Full

Bates: GLOMAG-23653 0241-0243

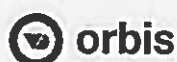


EXHIBIT 11

**INTTRAFIK EOOD**

SOFIA, Bulgaria

Active

Private

BvD ID n° BG205244843

The Global Ultimate Owner of this controlled subsidiary is MR DELYAN SLAVCHEV PEEVSKI

Key information

UL. EKZARH YOSIF, 119
1527 SOFIA
Bulgaria

Activity:

Corporate, Business Services

Date of incorporation:

2018

Turnover for 2019

\$ 515 th ↗

Net income for 2019

\$ -71.2 th ↘ -3955%

Ownership

1 shareholder
0 subsidiary
10 companies in the corporate group

PEPs and sanctions

This company is not the same
or similar to a risk relevant
name

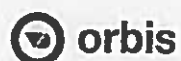


EXHIBIT 11

Financial profile

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
Operating revenue (Turnover)	515,221 ↗	0
P/L before tax	-71,223 ↘	-1,756
P/L for period [=Net income]	-71,223 ↘	-1,756
Cash flow	-67,777	n.a.
Total assets	175,761 ↗	79,616
Shareholders funds	-72,372 ↘	-1,171
Current ratio (x)	0.32 ↘	0.97
Profit margin (%)	-13.82	n.s.
Solvency ratio (Asset based) (%)	-41.18 ↘	-1.47
Number of employees	38	n.a.

Management

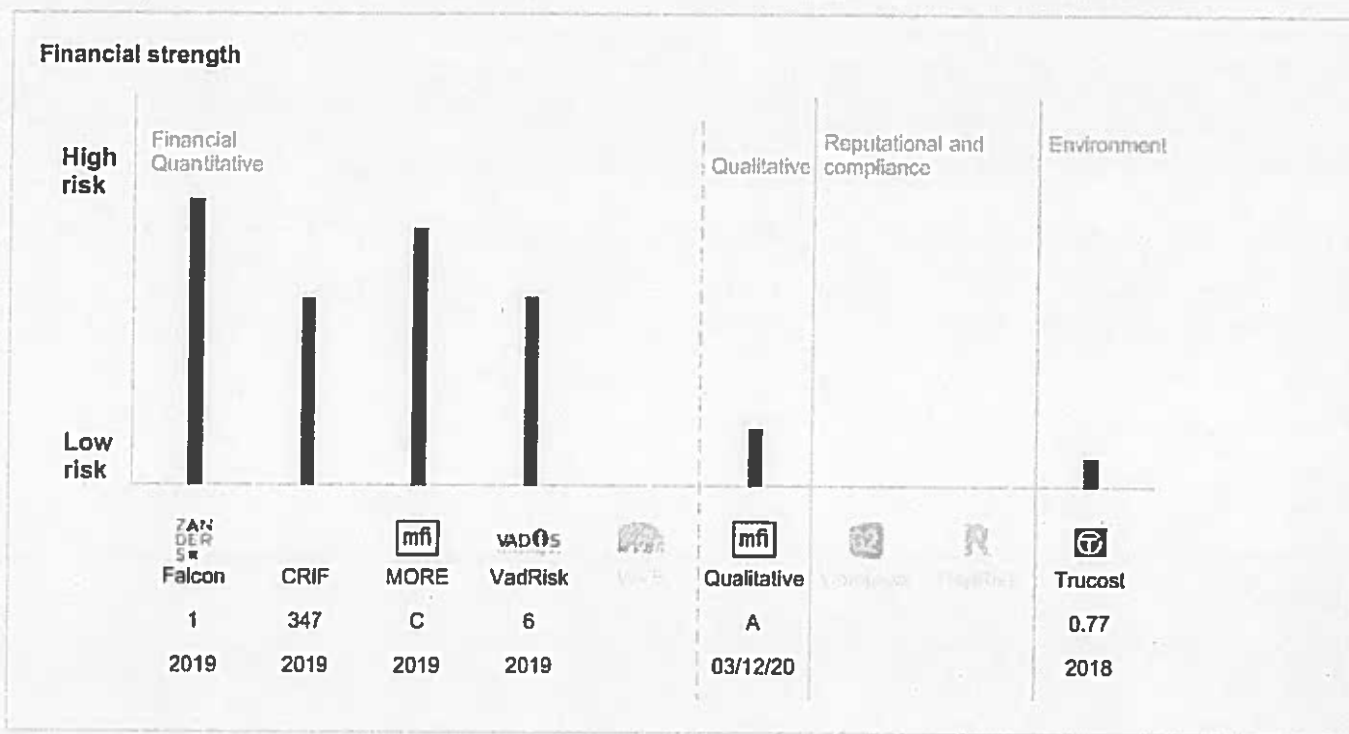
Mr Aleksandar Kirilov Georgiev

News stories since last year

0 negative stories
0 stories in total



EXHIBIT 11



Contact

Contact information

UL. EKZARH YOSIF, 119
1527 SOFIA
Bulgaria

Oblast

Sofia City

NUTS1

BG4 - Southwestern and South-Central Bulgaria

NUTS2

BG41 - Yugozapaden

NUTS3

BG412 - Sofia City

Industry & activities

Type of entity: Corporate
 BvD sector: Business Services
 NACE Rev. 2 main section: N - Administrative and support service activities

NACE Rev. 2 code(s)

Core code: 8010 Private security activities
 Primary code(s): 8010 Private security activities
 Secondary code(s): 4941 Freight transport by road

NAICS 2017 code(s) (derived from NACE Rev. 2 codes)

Core code: 5616 Investigation and Security Services
 Primary code(s): 561612 Security Guards and Patrol Services
 561613 Armored Car Services
 Secondary code(s): 484110 General Freight Trucking, Local
 484121 General Freight Trucking, Long-Distance, Truckload

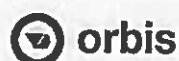


EXHIBIT 11

484122	General Freight Trucking, Long-Distance, Less Than Truckload
484220	Specialized Freight (except Used Goods) Trucking, Local
484230	Specialized Freight (except Used Goods) Trucking, Long-Distance

US SIC code(s) (derived from NACE Rev. 2 codes)

Core code:	738	Miscellaneous business services
Primary code(s):	7382	Security systems services
Secondary code(s):	4212	Local trucking without storage
	4213	Trucking, except local
	4214	Local trucking with storage

Identifiers

BvD ID number	BG205244843
BvD account number	BG205244843U
BvD9 number	388542275
UIC (Trade register number)	205244843
European VAT number	BG205244843
TIN (TIN)	205244843

Legal information

Active(updated in Orbis on 27/08/2018)

One-person private limited company - EOOD
Incorporated in 2018
Corporate

PEPs and sanctions

▶ This company is not the same or similar to a risk relevant name

Accounting information

Information for this record is provided by Creditreform Bulgaria (last delivery: 29/11/2020)

Most recent accounts: 2019
Available in Orbis since 06/2020
Types of account: Unconsolidated
Available for: 2 years

Accounts published in: BGN
Closing date: 31/12/2019
Filing type: Local registry filing
Accounting template: Corporate

Available account

31/12/2019

Unconsolidated, Local registry filing

Key indicators based on Unconsolidated, Local registry filing

Turnover for 2019

\$ 515 th ↗

Number of employees

38 ■



EXHIBIT 11

Legal events

Date	Type	Description	Source
14/09/2018	Registration	VAT registration	Registry Agency (BULSTAT register)
09/08/2018	Registration	Founded as EOOD (one person private ltd. co.)	Registry Agency (BULSTAT register)

Key financials & employees

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Operating revenue (Turnover)	515,221	0
L P/L before tax	-71,223	-1,756
L P/L for period [=Net income]	-71,223	-1,756
L Cash flow	-67,777	n.a.
L Total assets	175,761	79,616
L Shareholders funds	-72,372	-1,171
L Current ratio (x)	0.32	0.97
L Profit margin (%)	-13.82	n.s.
L ROE using P/L before tax (%)	n.s.	n.s.
L ROCE using P/L before tax (%)	n.s.	n.s.
L Solvency ratio (Asset based) (%)	-41.18	-1.47
L Number of employees	38	n.a.

Global standard format

Unconsolidated, Local registry filing

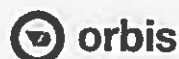


EXHIBIT 11

31/12/2019 31/12/2018
 USD USD
 12 months 12 months
 Local GAAP Local GAAP
 Exchange rate: BGN/USD 0.57438 0.58541

Balance sheet

Assets

Fixed assets	95,922	1,171
L Intangible fixed assets	8,041	1,171
L Tangible fixed assets	87,881	0
L Other fixed assets	0	0
Current assets	79,839	78,445
L Stock	0	0
L Debtors	0	72,591
L Other current assets	79,839	5,854
L Cash & cash equivalent	67,777	5,854
Total assets	175,761	79,616

Liabilities & equity

Shareholders funds	-72,372	-1,171
L Capital	574	585
L Other shareholders funds	-72,947	-1,756
Non-current liabilities	0	0
L Long term debt	0	0
L Other non-current liabilities	0	0
L Provisions	0	0
Current liabilities	248,133	80,787
L Loans	0	0
L Creditors	574	0
L Other current liabilities	247,559	80,787
Total shareh. funds & liab.	175,761	79,616

Memo lines



EXHIBIT 11

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Working capital	-67,777	-5,854
L Net current assets	-168,294	-2,342
L Enterprise value	n.a.	n.a.
L Number of employees	38	n.a.

Profit & loss account

L Operating revenue (Turnover)	515,221	0
L Sales	515,221	0
L Costs of goods sold	n.a.	n.a.
L Gross profit	n.a.	n.a.
L Other operating expenses	n.a.	n.a.
L Operating P/L [=EBIT]	-62,608	0
L Financial P/L	-8,616	-1,756
L Financial revenue	0	0
L Financial expenses	8,616	1,756
L P/L before tax	-71,223	-1,756
L Taxation	0	0
L P/L after tax	-71,223	-1,756
L Extr. and other P/L	0	0
L Extr. and other revenue	0	0
L Extr. and other expenses	0	0
L P/L for period [=Net income]	-71,223	-1,756

Memo lines

L Export revenue	n.a.	n.a.
L Material costs	14,934	n.a.
L Costs of employees	532,453	n.a.
L Depreciation & Amortization	3,446	n.a.



EXHIBIT 11

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Other operating items	26,996	0
L Interest paid	8,616	1,756
L Research & Development expenses	n.a.	n.a.
L Cash flow	-67,777	n.a.
L Added value	473,291	n.a.
L EBITDA	n.a.	n.a.

Global ratios

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541

Profitability ratios

L ROE using P/L before tax (%)	n.s.	n.s.
L ROCE using P/L before tax (%)	n.s.	n.s.
L ROA using P/L before tax (%)	-40.52	-2.21
L ROE using Net income (%)	n.s.	n.s.
L ROCE using Net income (%)	n.s.	n.s.
L ROA using Net income (%)	-40.52	-2.21
L Profit margin (%)	-13.82	n.s.
L Gross margin (%)	n.a.	n.a.
L EBITDA margin (%)	n.a.	n.a.
L EBIT margin (%)	-12.15	n.s.
L Cash flow / Operating revenue (%)	-13.16	n.a.
L Enterprise value / EBITDA (x)	n.a.	n.a.



EXHIBIT 11

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Market cap / Cash flow from operations (x)	n.a.	n.a.

Operational ratios

L Net assets turnover (x)	n.s.	n.s.
L Interest cover (x)	-7.27	0.00
L Stock turnover (x)	n.s.	n.s.
L Collection period (days)	0	n.s.
L Credit period (days)	0	n.s.
L Export revenue / Operating revenue (%)	n.a.	n.a.
L R&D expenses / Operating revenue (%)	n.a.	n.a.

Structure ratios

L Current ratio (x)	0.32	0.97
L Liquidity ratio (x)	0.32	0.97
L Shareholders liquidity ratio (x)	n.s.	n.s.
L Solvency ratio (Asset based) (%)	-41.18	-1.47
L Solvency ratio (Liability based) (%)	n.s.	n.s.
L Gearing (%)	n.s.	n.s.

Per employee ratios

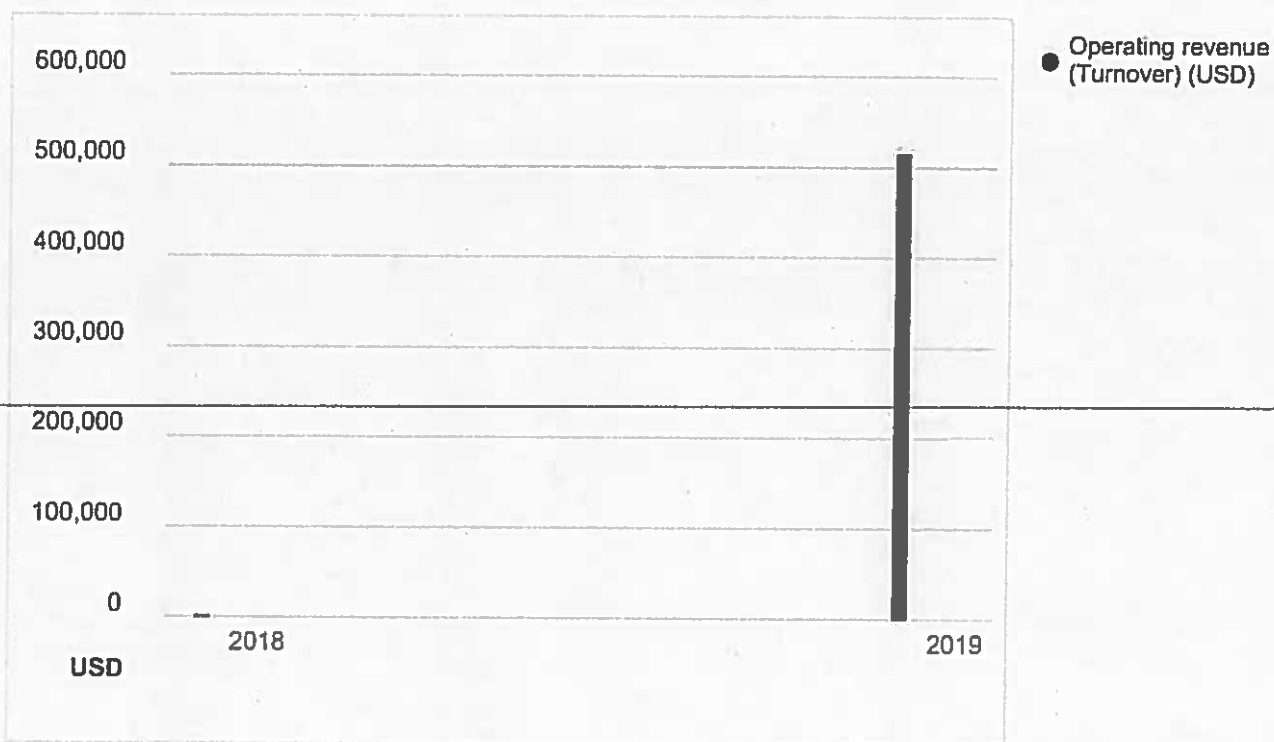
L Profit per employee (th)	-2	n.a.
L Operating revenue per employee (th)	14	n.a.
L Costs of employees / Operating revenue (%)	n.s.	n.a.
L Average cost of employee (th)	14	n.a.
L Shareholders funds per employee (th)	n.s.	n.a.



EXHIBIT 11

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Working capital per employee (th)	-2	n.a.
L Total assets per employee (th)	5	n.a.

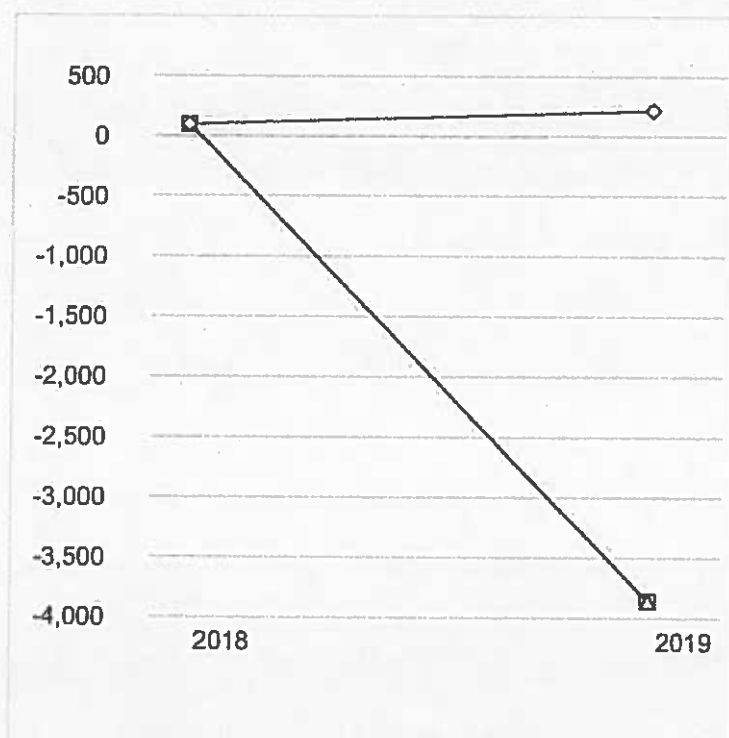
Graph - Value over time



Graph - Indices of several values over time



EXHIBIT 11



Base: 2018

■ P/L before tax (th USD)	-1.76
▲ P/L for period (=Net income) (th USD)	-1.76
◆ Total assets (th USD)	79.6

Peer comparison

Accounting year: Peer group year	Year	Operating revenue (Turnover) th USD	P/L before tax th USD
Median		515	37
Standard deviation		0	92
Average		515	51

CHASTNAYA OKHRANNAYA ORGANIZATSIYA GRUPPA	2019	515	1	62	4
INTERACTIVA SL	2019	515	2	210	1
CHASTNAYA OKHRANNAYA ORGANIZATSIYA ISKANDE	2019	515	3	159	2
INTTRAFIK EOOD	2019	515	4	-71	8
CONG TY TNHH DICH VU BAO VE LONG THIEN BAO	2019	515	5	-52	7
KUROSURODO YK	2019	515	6	n.a.	
KYOKKOKEIBIHOSHO KK	2019	515	6	n.a.	
FASUTOSEKYURITI, YK	2019	515	6	n.a.	
M.T.G. SECURITY SRL	2019	515	9	81	3
CHASTNOE OKHRANNOE PREDPRIYATIE VDV-A	2019	515	10	12	5
CHASTNAYA OKHRANNAYA ORGANIZATSIYA ALFA-SH	2019	515	11	7	6

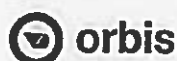


EXHIBIT 11

Accounting year: Peer group year	Year	P/L for period [=Net income] th USD	Total assets th USD
Median		29	111
Standard deviation		75	312
Average		35	275

CHASTNAYA OKHRANNAYA ORGANIZATSIYA GRUPPA	2019	53	4	88	5
INTERACTIVA SL	2019	157	1	601	2
CHASTNAYA OKHRANNAYA ORGANIZATSIYA ISKANDE	2019	117	2	973	1
INTTRAFIK EOOD	2019	-71	8	176	3
CONG TY TNHH DICH VU BAO VE LONG THIEN BAO	2019	-52	7	85	6
KUROSURODO YK	2019	n.a.		n.a.	
KYOKKOKEIBIHOSHO KK	2019	n.a.		n.a.	
FASUTOSEKYURITI, YK	2019	n.a.		n.a.	
M.T.G. SECURITY SRL	2019	76	3	133	4
CHASTNOE OKHRANNOE PREDPRIYATIE VDV-A	2019	6	5	72	7
CHASTNAYA OKHRANNAYA ORGANIZATSIYA ALFA-SH	2019	-4	6	71	8

Accounting year: Peer group year	Year	Shareholders funds th USD	Number of employees
Median		55	12
Standard deviation		318	27
Average		189	28

CHASTNAYA OKHRANNAYA ORGANIZATSIYA GRUPPA	2019	78	3	4	9
INTERACTIVA SL	2019	431	2	10	7
CHASTNAYA OKHRANNAYA ORGANIZATSIYA ISKANDE	2019	944	1	12	6
INTTRAFIK EOOD	2019	-72	8	38	5
CONG TY TNHH DICH VU BAO VE LONG THIEN BAO	2019	35	5	5	8
KUROSURODO YK	2019	n.a.		1	11
KYOKKOKEIBIHOSHO KK	2019	n.a.		50	3
FASUTOSEKYURITI, YK	2019	n.a.		4	9
M.T.G. SECURITY SRL	2019	76	4	52	2
CHASTNOE OKHRANNOE PREDPRIYATIE VDV-A	2019	19	6	44	4
CHASTNAYA OKHRANNAYA ORGANIZATSIYA ALFA-SH	2019	5	7	88	1

Peer group definition

Closest 10 international companies according to the Operating revenue (Turnover) of the subject company for the last available year (2019) amongst the standard peer group.

The standard peer group is based on NACE Rev. 2 industry classification: 8010 - Private security activities.



EXHIBIT 11

Company ratings

No data available for this company

Country ratings

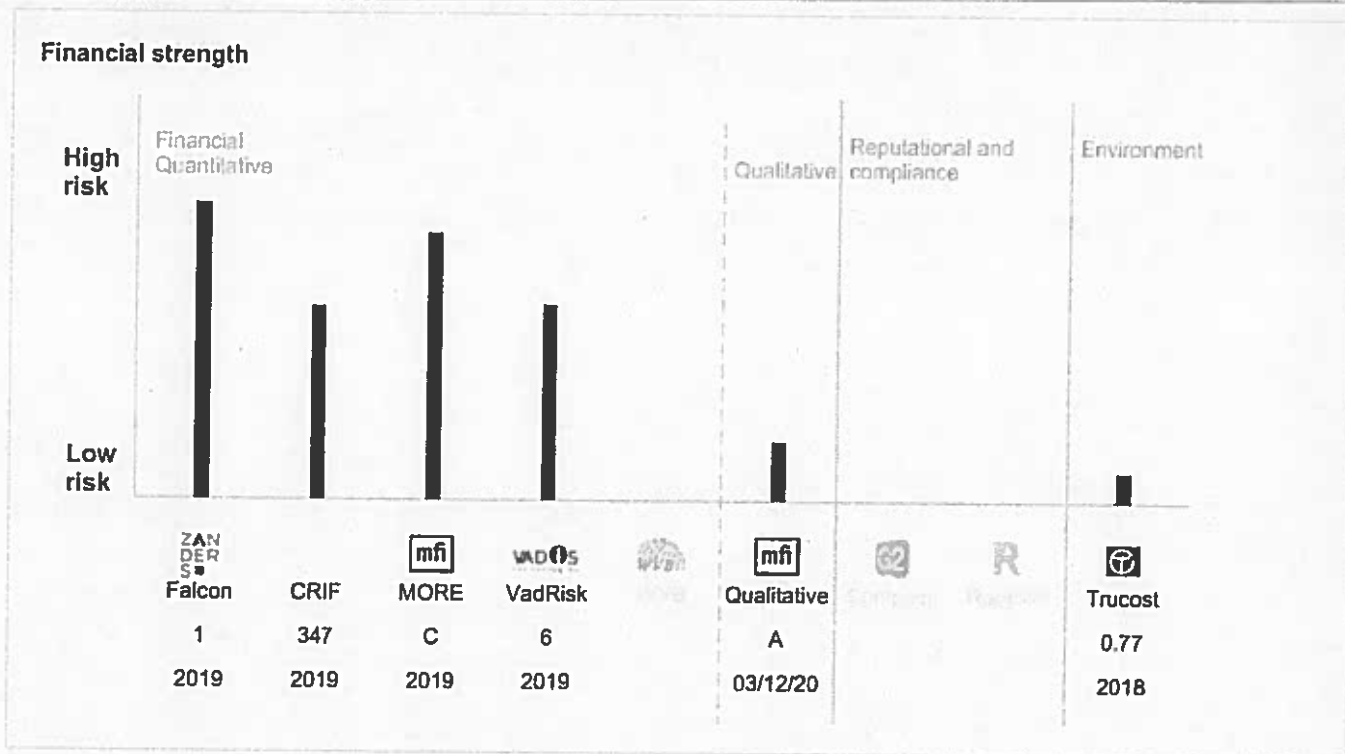
Your subscription does not include some of the agency ratings.

EIU

	Rating	Date	Action/Direction	Outlook	Watch
Overall country rating	BBB	01/09/2020			
Banking sector rating	BB	01/09/2020		Stable	

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Financial strength summary



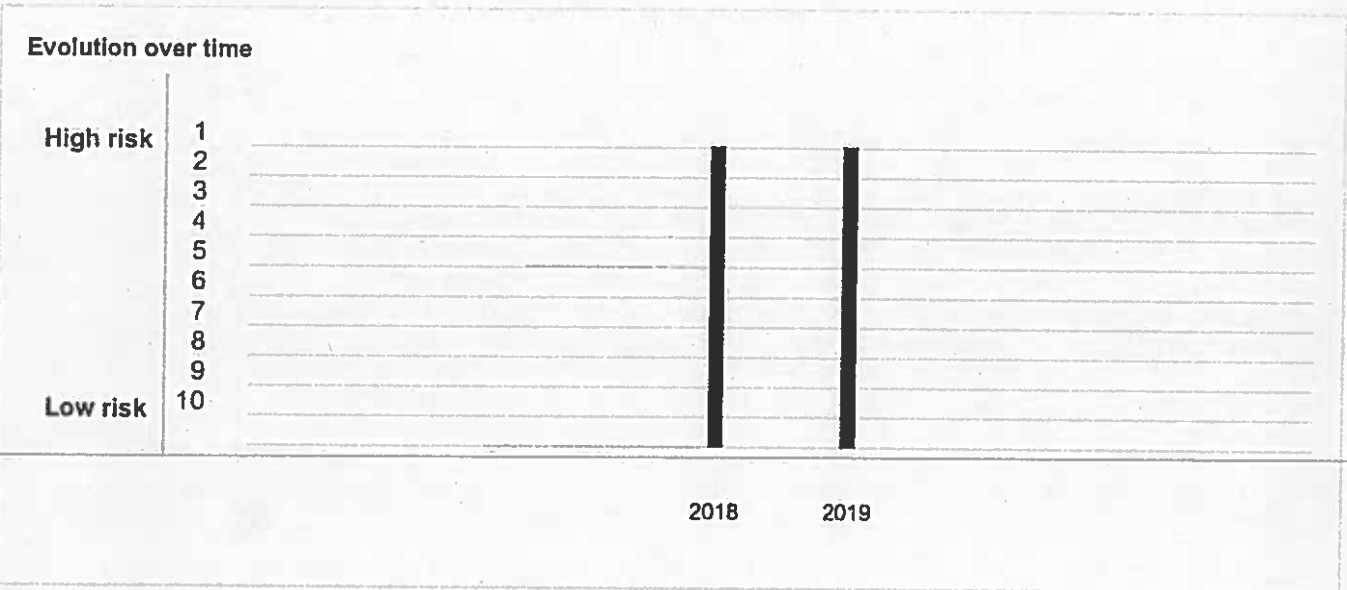
Falcon counterparty risk score by Zanders



EXHIBIT 11



Probability of default:	19.86%
Credit limit:	0 \$
Industry:	Administrative and support service activities



Evolution over time (Tabular view)

	2018	2019
Counterparty Risk Score (CRS)	1	1
Probability of default (%)	19.86	19.86
Falcon credit limit (\$)	0	0

Observations

- 2019 Original currency is not EUR
- 2018 Original currency is not EUR



EXHIBIT 11

Falcon influencing ratios

	2018	2019
Operations and Liquidity		
Turnover growth	2	0
Return on sales	0	0
Current ratio	3	1
Debtor days	2	7
Debt services		
Interest coverage ratio	6	0
Debt/EBITDA	2	2
Capital structure		
Gearing	0	0
Solvency	0	0
Tangible net worth	0	0

Financial stability score by CRIF Decision Solutions Ltd

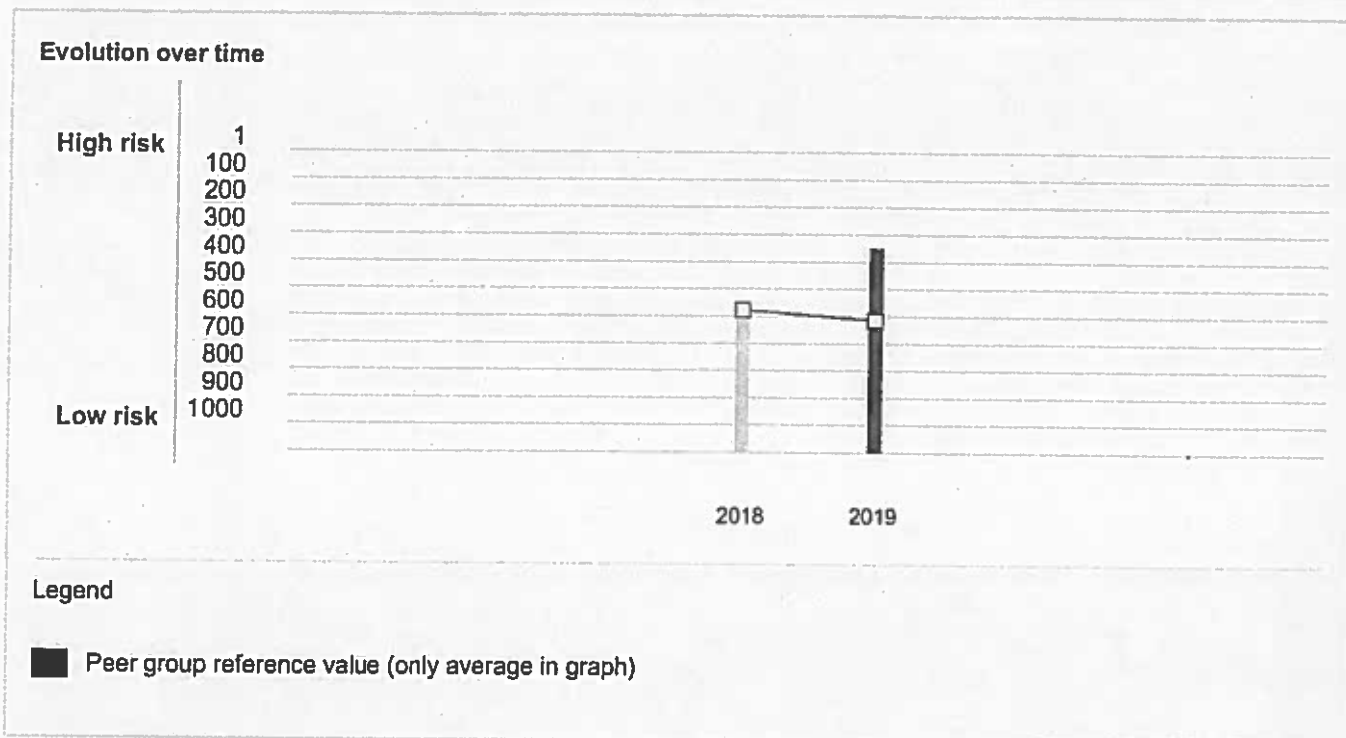


347
for 2019

Key influencing factors	- Profitability - Short-term liquidity - Asset management efficiency
Scores for peer group	265 Minimum 577 Average 795 Maximum
Industry	Private security activities



EXHIBIT 11



Evolution over time (Tabular view)

	2018	2019
Company	557	347
Key factors	<ul style="list-style-type: none"> - Financial leverage - Asset management efficiency 	<ul style="list-style-type: none"> - Profitability - Short-term liquidity - Asset management efficiency
Peer group		
Minimum	265	290
Average	577	615
Maximum	795	770

MORE credit risk score by modeFinance

C - Risky
for 2019

Confidence level: 86%

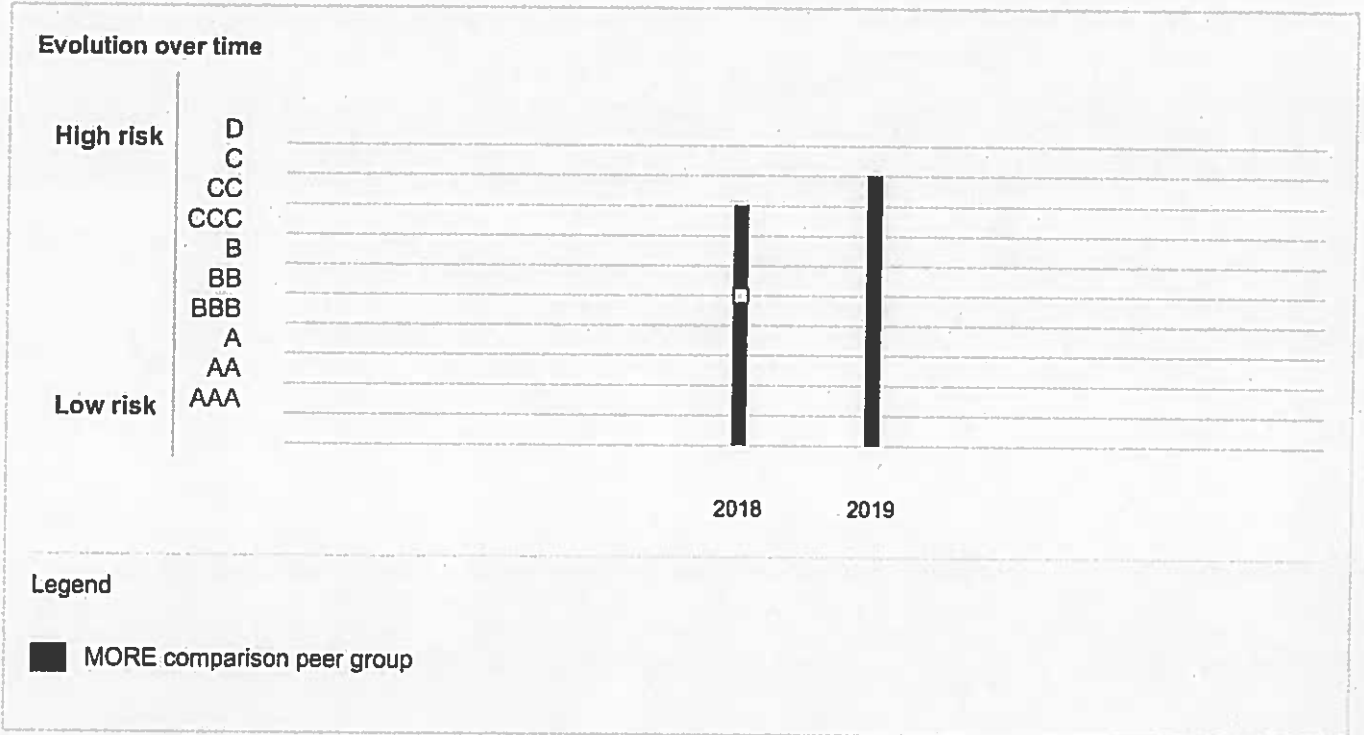
Probability of default: 80.0%

Credit limit: 0 \$

Industry: Services



EXHIBIT 11



Evolution over time (Tabular view)

	2018	2019
Score		
Company	CC	C
Peer group	BB	n.a.
Probability of default (%)		
Company	42.00	80.00
Peer group	1.90	n.a.
Confidence level (%)		
Company	86	86
Credit limit (\$)		
Company	0.00	0.00



EXHIBIT 11

MORE influencing ratios	2018	2019
Solvency ratios		
Leverage ratio	D	D
Assets to debt	D	D
Liquidity ratios		
Current ratio	BB	C
Quick ratio	BBB	CCC
Cash conversion cycle (CCC)	C	A
Profitability and economic ratios		
Return on investment (ROI)		D
Return on equity (ROE)	D	D
Asset turnover	D	
Interest coverage ratio		
Interest paid coverage		D

Predictive Indicators by Vadis

Propensity of bankruptcy

6

Risk of bankruptcy higher than national average
for 2019

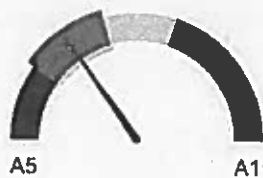
Key influencing factors:

- Profit and loss period
- Evolution of other current liabilities
- Other current liabilities
- + Evolution of collection period (company's sector financials)
- Current ratio



EXHIBIT 11

Propensity to be sold



A4

Among the 2 - 4 % of companies with the highest probability to be sold

for 2019

Evolution over time

High risk

9
8
7
6
5

Low risk

4
3
2
1

2019

Evolution over time (Tabular view)

2019

Propensity of bankruptcy 6

Key influencing factors

- Profit and loss period
- Evolution of other current liabilities
- Other current liabilities
- + Evolution of collection period (company's sector financials)
- Current ratio

Propensity to be sold A4

Qualitative score by modeFinance



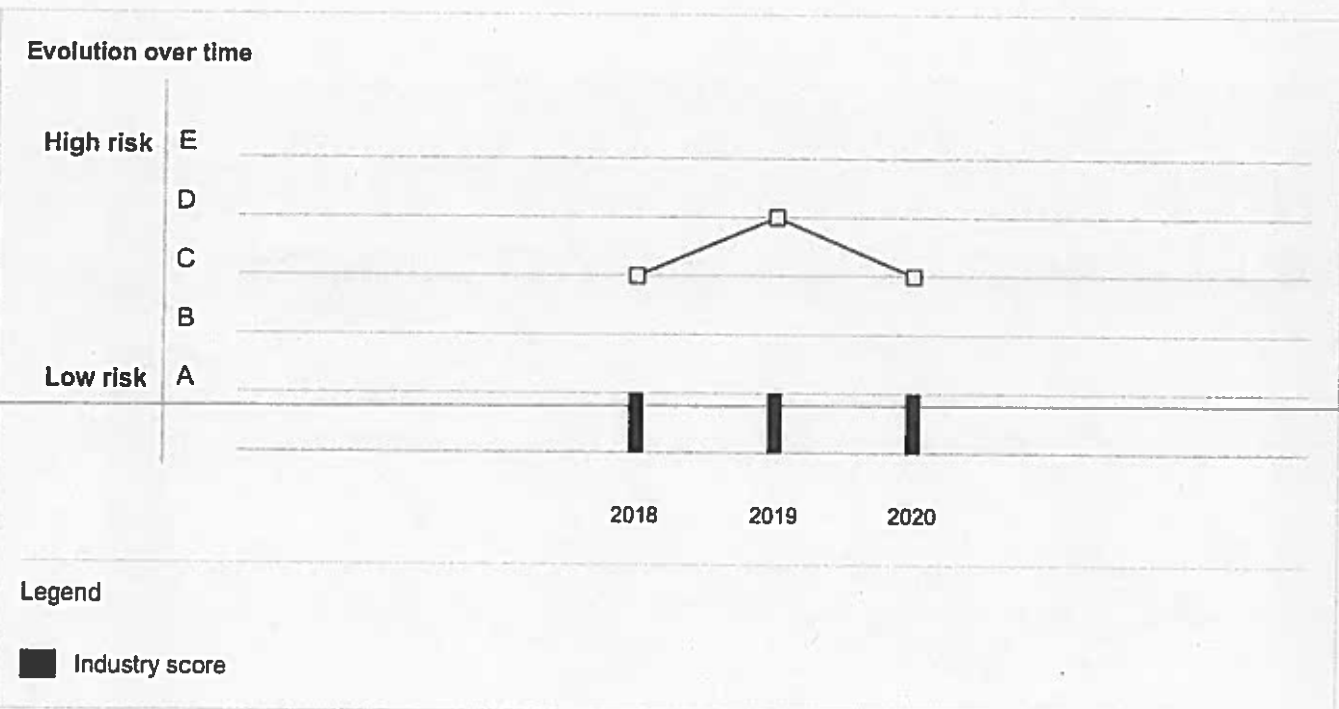
EXHIBIT 11

A - Good
on 03/12/2020
Confidence level: 56.0%

Credit limit: n.a.
No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.

Key influencing factors: A - GUO MORE score / status
C - Directors average MORE score / status
B - Size of the GUO

Industry score: C



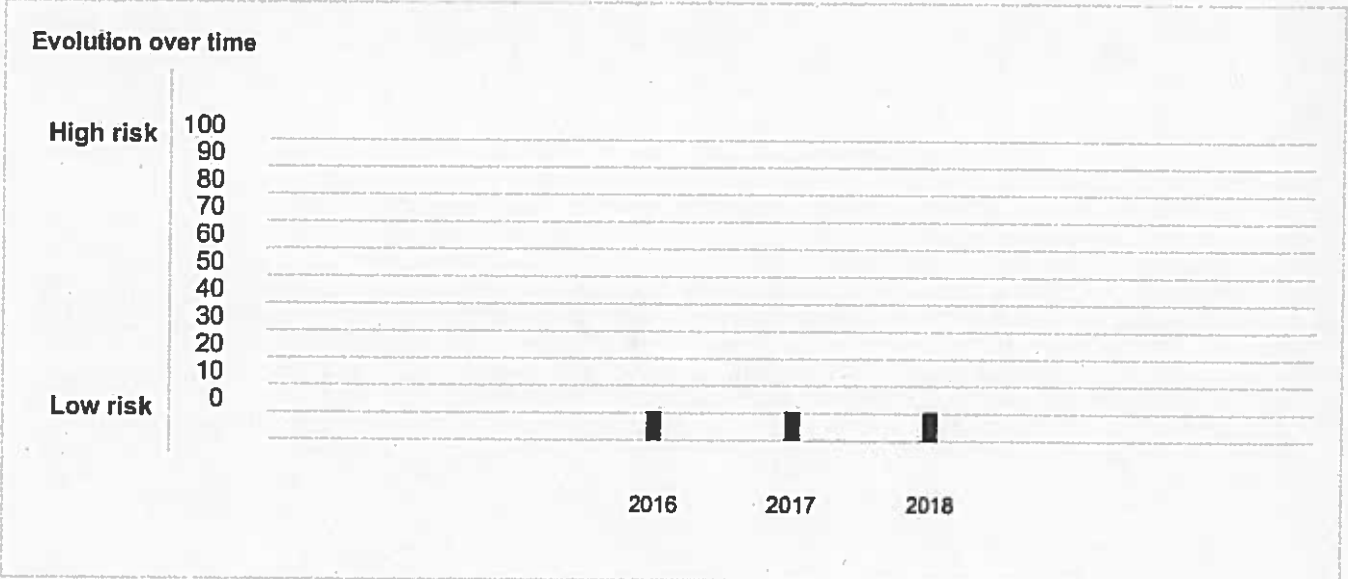
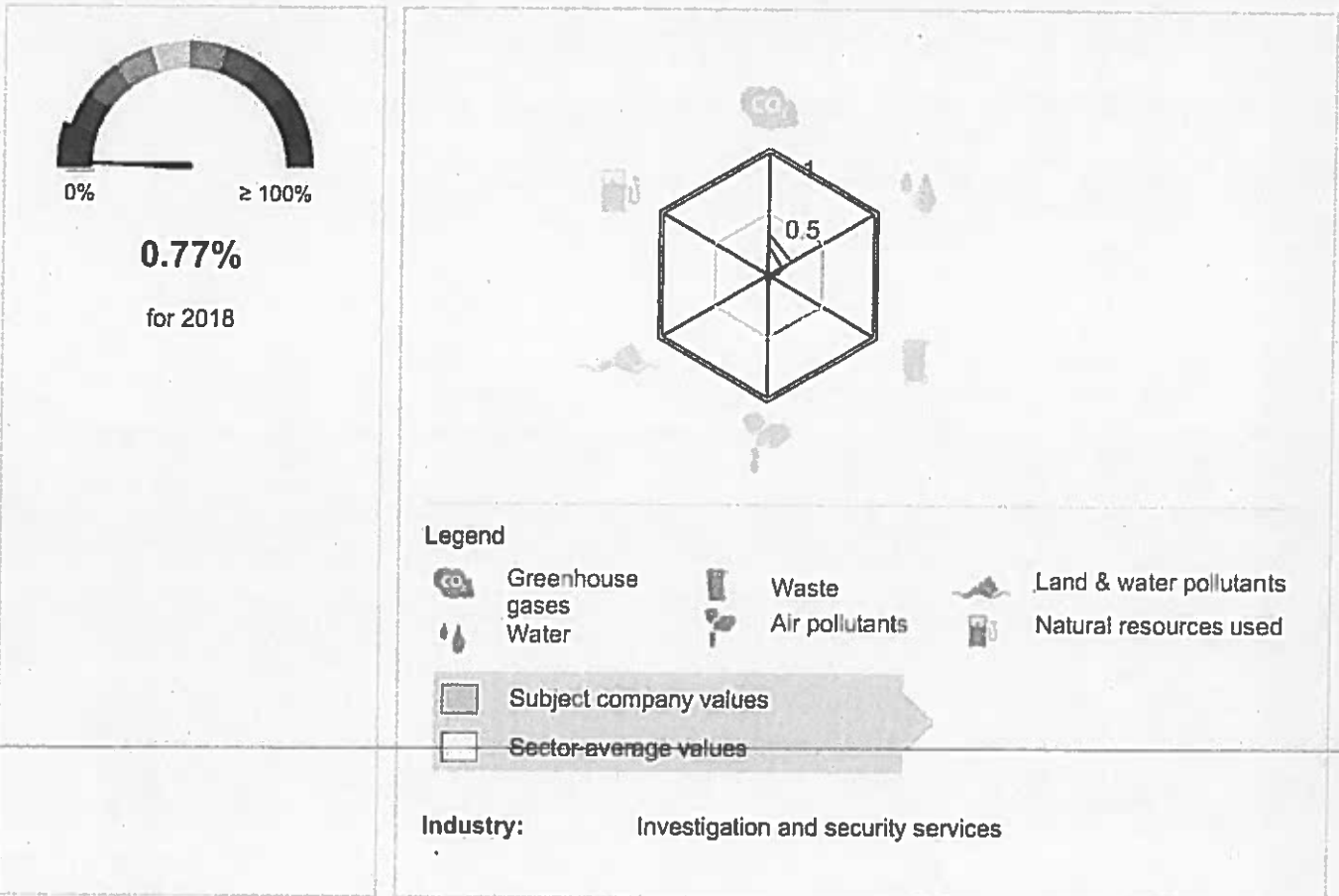
Evolution over time (Tabular view)

	2018	2019	03/12/2020
Qualitative score	A	A	A
Confidence level (%)	48	55	56
Credit limit	n.a.	n.a.	n.a.
Industry score	C	D	C
Credit limit annotations			
03/12/2020	No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.		
2019	No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.		
2018	No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.		



EXHIBIT 11

Environmental score by Trucost



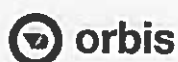


EXHIBIT 11

Evolution over time (Tabular view)

	2016	2017	2018
Environmental score (%)	0.51	0.53	0.77

Managed funds

There is no available data for this entity set

Current directors & managers

Management & staff 1

Senior Management

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director	CB
---	----

Source

CB:Creditreform (Bulgaria)

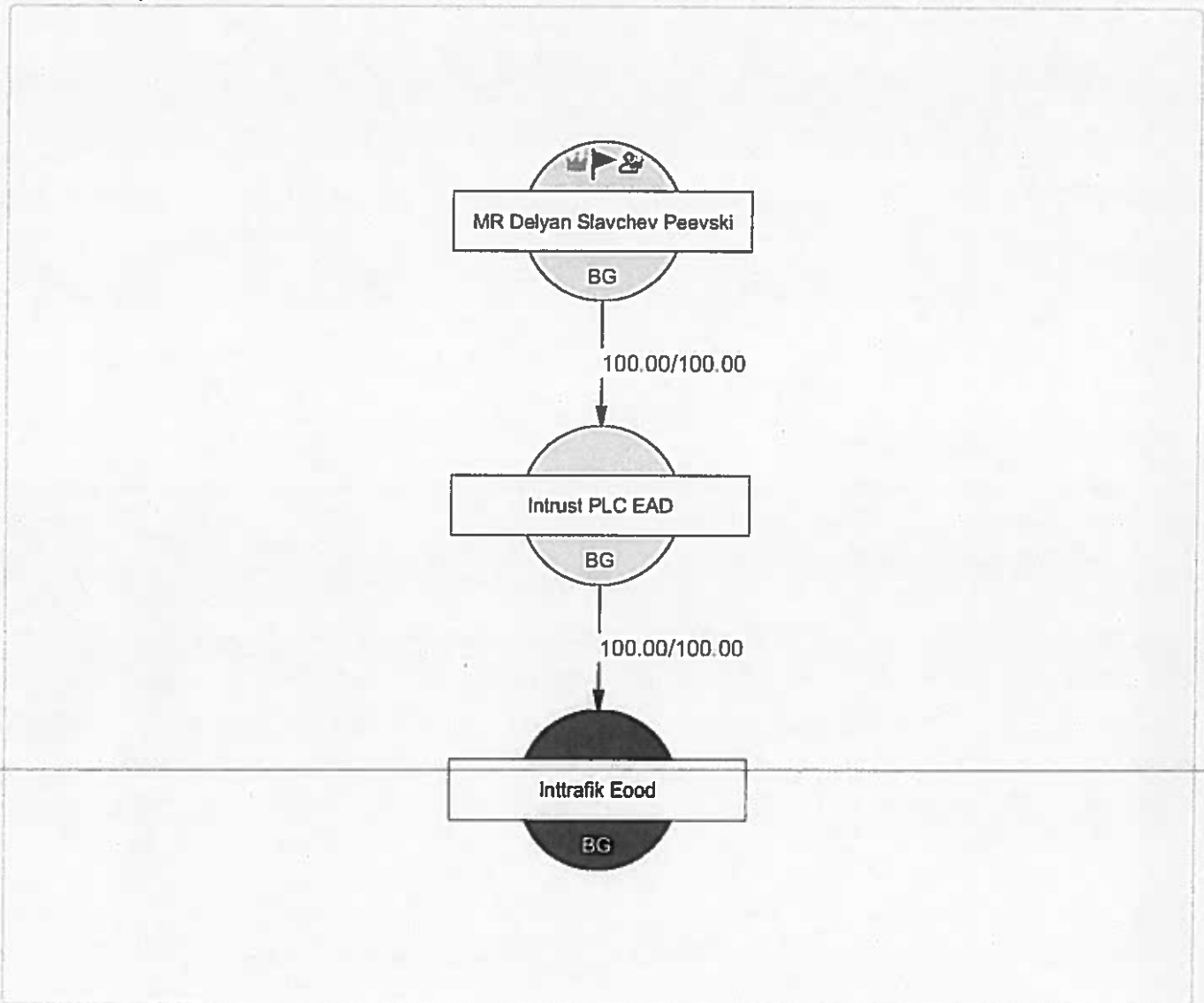
Filters

Formal sources

Bodies & departments

Ownership structure

Graph : Shareholders



1 shareholder and the controlling shareholder path are represented.

Legend

- ↔ Controlling shareholder
- 👤 An individual
- 👤 Beneficial Owner
- 👑 Global Ultimate Owner
- ▶ There are names that are the same, or similar to, a risk relevant name

- x/x Direct / Total ownership %
- BR Branch
- CQP1 50% + 1 Share
- CTP Calculated total percentage
- DM Director/Manager
- FC Foreign company
- GP General partner
- JO Jointly owned, = 50 %
- MO Majority owned, > 50%
- n.a. Not available
- NG Negligible, <=0.01%
- REG Beneficial Owner from register, = 100%



EXHIBIT 11

T	Sole trader, = 100 %
VE	Vessel
WO	Wholly owned, >= 98%

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Geographic footprint

Number of companies in the corporate group per country



The map represents the geographic location of the companies in the corporate group

All 10 companies in the corporate group are represented

Legend

Number of entities by country

■ More than 1

■ Less than 1

📍 Country of both the company and the GUO

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Corporate group



EXHIBIT 11

There are 10 companies in the corporate group

Name	Country	Ownership		Level of own.	Info Source
		Direct %	Total %		
Global Ultimate Owner					
MR DELYAN SLAVCHEV PEEVSKI	BG				

Ultimately owned subsidiaries

INT LTD EOOD	BG	100.00	100.00	1	CB
▼ INTRUST PLC EAD	BG	100.00	100.00	1	CB
L BM SYSTEMS EAD	BG	100.00	100.00	2	CB
L INT INVEST EOOD	BG	100.00	100.00	2	CB
L INTTRAFIK EOOD	BG	100.00	100.00	2	CB
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE	IT	100.00	100.00	2	HO
L REAL ESTATES INT LTD EOOD	BG	100.00	100.00	2	CB
► TELEGRAPH MEDIA EOOD	BG	100.00	100.00	2	CB
L TELEGRAPH NEWSPAPER LTD EOOD	BG	100.00	100.00	2	CB

Name

Date

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	
----------------------------	--

Ultimately owned subsidiaries

INT LTD EOOD	11/2020
▼ INTRUST PLC EAD	11/2020
L BM SYSTEMS EAD	11/2020
L INT INVEST EOOD	11/2020
L INTTRAFIK EOOD	11/2020
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE	07/2019
L REAL ESTATES INT LTD EOOD	11/2020
► TELEGRAPH MEDIA EOOD	11/2020
L TELEGRAPH NEWSPAPER LTD EOOD	11/2020

Legend

► There are names that are the same, or similar to, a risk relevant name

Ultimate Owner definition





The path from the company to its Ultimate Owner is minimum 50.01%



EXHIBIT 11

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.



Beneficial Owners

Beneficial Owner (1)					
	MR DELYAN SLAVCHEV PEEVSKI Bulgaria	Distance: 2			
Name		Country	Ownership Direct %	Ownership Total %	Source
MR DELYAN SLAVCHEV PEEVSKI		BG	100.00	100.00	CB 11/2020
INTRUST PLC EAD		BG	100.00	100.00	CB 11/2020
INTRAFIK EOOD		BG			
Other Ultimate Beneficiary (0)					
This company has no Other Ultimate Beneficiaries.					

Beneficial Owner from register (0)

There are no Beneficial Owners from register for this company

Legend

-  There are names that are the same, or similar to, a risk relevant name
-  Has enough influence power to control the result of a vote in the company

Beneficial Owner definition

The minimum percentage of ownership at first level is 10.00%, the minimum percentage at further levels is 50.01%.

I also consider any individual at the top of a path who has an unknown percentage of ownership (% such as '>x%' are considered unknown)

I also consider any individual at the top of a path who has a percentage of minimum 10.00% (with the requested 50.01% at all other levels).

Beneficial Owners from register are not subject to the defined thresholds.

Controlling shareholders

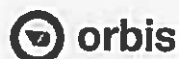


EXHIBIT 11

BvD independence indicator

**D - Direct majority ownership**

Has an identified shareholder with over 50% direct ownership or is a branch/foreign company

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)
			Direct %	Total %	Source	Date	
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	100.00	100.00	CB	11/2020	-
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22
INTTRAFIK EOOD	BG	C					1

Name	No of employees
MR DELYAN SLAVCHEV PEEVSKI	▶ -
INTRUST PLC EAD	29
INTTRAFIK EOOD	38

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

C = Corporate

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Current shareholders

Name	Country	Type	Ownership	Info	Op. Rev. (m USD)	No of employees
INTRUST PLC EAD	BG	C	= 100.00	CB	22	29

Legend

C = Corporate

Shareholders history

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22	29



EXHIBIT 11

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
			100.00	100.00	CB	03/2020		
			100.00	100.00	CB	09/2019		
			100.00	100.00	CB	03/2019		
			100.00	100.00	CB	09/2018		

Legend

C = Corporate

Previous shareholders

There is no data available for this entity.

Filters

Shareholders: All
All information since 01/2002

Shareholders by T-Rank

Name	Country	Type	T-rank (%)	Distance	Raw data	
					Direct (%)	Total (%)
INTRUST PLC EAD	n.a.	C	100.00	1	100.00	
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	100.00	2		

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

C = Corporate

I = One or more named individuals or families

Filters

All shareholders
T-Rank threshold 5%
Sorted by T-rank percentage

Shareholder power & coalitions

Most influential shareholders

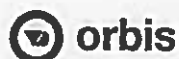


EXHIBIT 11

Name	Country	Type	Distance	Influence power (%)
INTRUST PLC EAD	n.a.	C	1	100.0
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	2	100.0

Possible controlling coalitions

Controlling coalitions do not apply because there is a shareholder with enough influence power to control the result of a vote in the company: MR DELYAN SLAVCHEV PEEVSKI.

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

- C Corporate
- I One or more named individuals or families

Research

Company profiles

Filters:

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

No data available for this company

Industry profiles

Source	Document	Type	Date
MarketLine Company operates in the industry	Global Transportation Services	Industry profile	29/07/2020
	Global Transportation Services		07/05/2019
	Global Transportation Services		12/07/2018
	Global Transportation Services		29/09/2017
	Global Transportation Services		28/11/2016
	Global Transportation Services		23/06/2016
	Global Transportation Services		22/06/2016
	Global Transportation Services		01/01/2015
	Global Transportation Services		01/02/2014

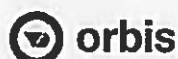


EXHIBIT 11

	Global Transportation Services		01/03/2013
	Global Transportation Services		01/02/2012
	Global Transportation Services		01/11/2010
	Global Transportation Services		01/12/2009
	Global Transportation Services		01/12/2008
MarketLine Company operates in the industry	Transportation Services in Europe	Industry profile	29/07/2020
	Transportation Services in Europe		07/05/2019
	Transportation Services in Europe		12/07/2018
	Transportation Services in Europe		29/09/2017
	Transportation Services in Europe		28/11/2016
	Transportation Services in Europe		23/06/2016
	Transportation Services in Europe		22/06/2016
	Transportation Services in Europe		01/01/2015
	Transportation Services in Europe		01/02/2014
	Transportation Services in Europe		01/03/2013
	Transportation Services in Europe		01/02/2012
	Transportation Services in Europe		01/11/2010
	Transportation Services in Europe		01/12/2009
	Transportation Services in Europe		01/12/2008
MarketLine Company operates in the industry	Global Security Services	Industry profile	07/05/2019
	Global Security Services		27/04/2018
	Global Security Services		05/06/2017
	Global Security Services		22/11/2016
	Global Security Services		11/11/2015
	Global Security Services		11/06/2014



EXHIBIT 11

Global Security Services	01/10/2013
Global Security Services	01/05/2012
Global Security Services	01/07/2011

Industry profiles Filters

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

My variables

Unconsolidated, Local registry filing
No data available for this company

Appendix – Omitted chapters

The chapters listed below have been omitted because they have no data for this company, or the data cannot be represented in the PDF

Public tenders
Detailed format
Cash flow statement
Segment data - Business lines
Segment data - Geographic segments
Graph - company ratings over time
Global score by WVB
Albatross score by Zanders
Compass score merchant risk by G2
RepRisk indicators by RepRisk
National scores
Stock profile
Annual stock data
Annual stock valuation
Pricing series
Beta and price volatility
Earnings estimates
Additional estimates
Brokers recommendations
Bonds and loans
Credit default swaps
Previous directors & managers
Current auditors, bankers & other advisors
Previous auditors, bankers & other advisors
Current subsidiaries
Branches
Innovation strength
Patent portfolio
Royalties agreements
Company and market news
FACTIVA news
Mergers & acquisitions
Crossborder investments
Liquidity events & potential beneficiaries
Local registry documents
aRMadillo
Global reports



EXHIBIT 11

EOL SEC filings

Exhibit 12 Withheld in Full

Bates: GLOMAG-23653 0276–0278

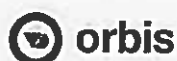


EXHIBIT 13

**REAL ESTATES INT LTD EOOD**

SOFIA, Bulgaria

Active

Private

BvD ID n° BG204930572

The Global Ultimate Owner of this controlled subsidiary is MR DELYAN SLAVCHEV PEEVSKI

Key information

UL. EKZARH YOSIF, 119
1527 SOFIA
Bulgaria

Activity:

Corporate, Property Services

Date of incorporation:

2018

Turnover for 2019

\$ 0.00

Net income for 2019

\$ -1.72 th

Ownership

1 shareholder
0 subsidiary
10 companies in the corporate group

PEPs and sanctions



This company is not the same or similar to a risk relevant name

Financial profile

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
Operating revenue (Turnover)	0	n.a.
P/L before tax	-1,723	n.a.
P/L for period [=Net income]	-1,723	n.a.
Total assets	1,149 ↗	585
Shareholders funds	-1,149 ↘	585
Current ratio (x)	0.50	n.s.
Solvency ratio (Asset based) (%)	-100.00 ↘	100.00

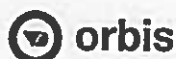
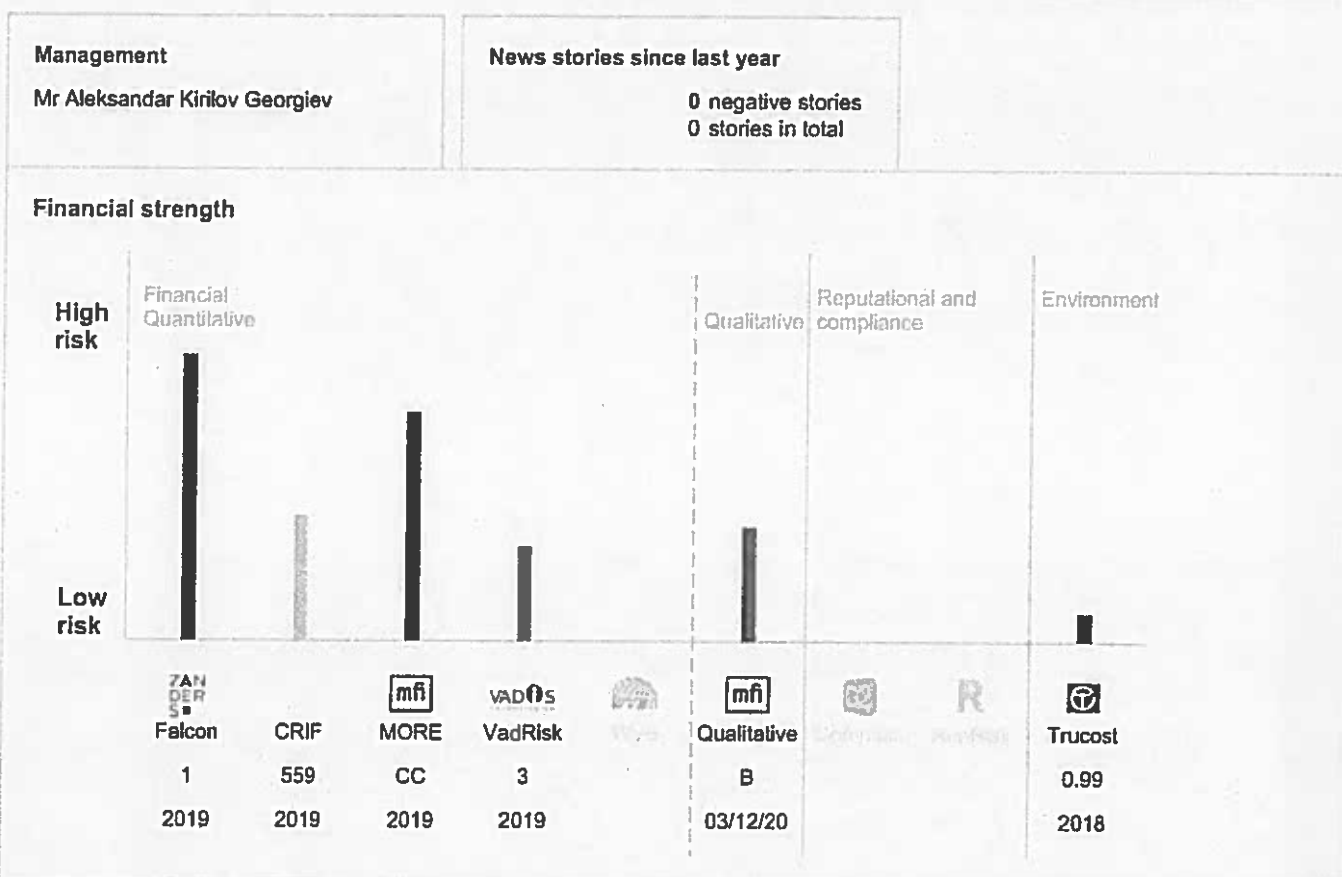


EXHIBIT 13



Contact

Contact information

UL. EKZARH YOSIF, 119
1527 SOFIA
Bulgaria

Oblast

Sofia City

NUTS1

BG4 - Southwestern and South-Central Bulgaria

NUTS2

BG41 - Yugozapaden

NUTS3

BG412 - Sofia City

Industry & activities

Type of entity: Corporate
BvD sector: Property Services
NACE Rev. 2 main section: L - Real estate activities

NACE Rev. 2 code(s)

Core code: 6810 Buying and selling of own real estate
Primary code(s): 6810 Buying and selling of own real estate

NAICS 2017 code(s) (derived from NACE Rev. 2 codes)

Core code: 5312 Offices of Real Estate Agents and Brokers

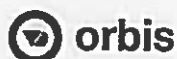


EXHIBIT 13

Primary code(s): 531210 Offices of Real Estate Agents and Brokers

US SIC code(s) (derived from NACE Rev. 2 codes)

Core code: 653 Real estate agents and managers
 Primary code(s): 6531 Real estate agents and managers

Identifiers

BvD ID number	BG204930572
BvD account number	BG204930572U
BvD9 number	372558088
UIC (Trade register number)	204930572
European VAT number	BG204930572
TIN (TIN)	204930572

Legal information

Active(updated in Orbis on 15/01/2018)

One-person private limited company - EOOD
 Incorporated in 2018
 Corporate

PEPs and sanctions

▶ This company is not the same or similar to a risk relevant name

Accounting Information

Information for this record is provided by Creditreform Bulgaria (last delivery: 29/11/2020)

Most recent accounts: 2019
 Available in Orbis since 06/2020
 Types of account: Unconsolidated
 Available for: 2 years

Accounts published in: BGN
 Closing date: 31/12/2019
 Filing type: Local registry filing
 Accounting template: Corporate

Available account

31/12/2019 Unconsolidated, Local registry filing

Key indicators based on Unconsolidated, Local registry filing

Turnover for 2019

\$ 0.00 ■

Legal events



EXHIBIT 13

Date	Type	Description	Source
19/02/2018	Registration	VAT registration	Registry Agency (BULSTAT register)
09/01/2018	Registration	Founded as EOOD (one person private ltd. co.)	Registry Agency (BULSTAT register)
09/01/2018	Registration	Founded as EOOD (one person private ltd. co.)	Registry Agency (BULSTAT register)

Key financials & employees

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Operating revenue (Turnover)	0	n.a.
L P/L before tax	-1,723	n.a.
L P/L for period [=Net income]	-1,723	n.a.
L Cash flow	n.a.	n.a.
L Total assets	1,149	585
L Shareholders funds	-1,149	585
L Current ratio (x)	0.50	n.s.
L Profit margin (%)	n.s.	n.a.
L ROE using P/L before tax (%)	n.s.	n.a.
L ROCE using P/L before tax (%)	n.s.	n.a.
L Solvency ratio (Asset based) (%)	-100.00	100.00
L Number of employees	n.a.	n.a.

Global standard format

Unconsolidated, Local registry filing



EXHIBIT 13

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541

Balance sheet

Assets

Fixed assets	0	0
L Intangible fixed assets	0	0
L Tangible fixed assets	0	0
L Other fixed assets	0	0
Current assets	1,149	585
L Stock	0	0
L Debtors	0	0
L Other current assets	1,149	585
L Cash & cash equivalent	1,149	585
Total assets	1,149	585

Liabilities & equity

Shareholders funds	-1,149	585
L Capital	574	585
L Other shareholders funds	-1,723	0
Non-current liabilities	0	0
L Long term debt	0	0
L Other non-current liabilities	0	0
L Provisions	0	0
Current liabilities	2,298	0
L Loans	0	0
L Creditors	0	0
L Other current liabilities	2,298	0
Total shareh. funds & liab.	1,149	585

Memo lines



EXHIBIT 13

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Working capital	-1,149	-585
L Net current assets	-1,149	585
L Enterprise value	n.a.	n.a.
L Number of employees	n.a.	n.a.

Profit & loss account

L Operating revenue (Turnover)	0	n.a.
L Sales	0	n.a.
L Costs of goods sold	n.a.	n.a.
L Gross profit	n.a.	n.a.
L Other operating expenses	n.a.	n.a.
L Operating P/L [=EBIT]	0	n.a.
L Financial P/L	-1,723	n.a.
L Financial revenue	0	n.a.
L Financial expenses	1,723	n.a.
L P/L before tax	-1,723	n.a.
L Taxation	0	n.a.
L P/L after tax	-1,723	n.a.
L Extr. and other P/L	0	n.a.
L Extr. and other revenue	0	n.a.
L Extr. and other expenses	0	n.a.
L P/L for period [=Net income]	-1,723	n.a.

Memo lines

L Export revenue	n.a.	n.a.
L Material costs	n.a.	n.a.
L Costs of employees	n.a.	n.a.
L Depreciation & Amortization	n.a.	n.a.



EXHIBIT 13

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Other operating items	0	n.a.
L Interest paid	1,723	n.a.
L Research & Development expenses	n.a.	n.a.
L Cash flow	n.a.	n.a.
L Added value	n.a.	n.a.
L EBITDA	n.a.	n.a.

Global ratios

Unconsolidated, Local registry filing

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541

Profitability ratios

L ROE using P/L before tax (%)	n.s.	n.a.
L ROCE using P/L before tax (%)	n.s.	n.a.
L ROA using P/L before tax (%)	n.s.	n.a.
L ROE using Net income (%)	n.s.	n.a.
L ROCE using Net income (%)	n.s.	n.a.
L ROA using Net income (%)	n.s.	n.a.
L Profit margin (%)	n.s.	n.a.
L Gross margin (%)	n.a.	n.a.
L EBITDA margin (%)	n.a.	n.a.
L EBIT margin (%)	n.s.	n.a.
L Cash flow / Operating revenue (%)	n.a.	n.a.
L Enterprise value / EBITDA (x)	n.a.	n.a.



EXHIBIT 13

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Market cap / Cash flow from operations (x)	n.a.	n.a.

Operational ratios

L Net assets turnover (x)	n.s.	n.a.
L Interest cover (x)	0.00	n.a.
L Stock turnover (x)	n.s.	n.a.
L Collection period (days)	n.s.	n.a.
L Credit period (days)	n.s.	n.a.
L Export revenue / Operating revenue (%)	n.a.	n.a.
L R&D expenses / Operating revenue (%)	n.a.	n.a.

Structure ratios

L Current ratio (x)	0.50	n.s.
L Liquidity ratio (x)	0.50	n.s.
L Shareholders liquidity ratio (x)	n.s.	n.s.
L Solvency ratio (Asset based) (%)	-100.00	100.00
L Solvency ratio (Liability based) (%)	n.s.	n.s.
L Gearing (%)	n.s.	0.00

Per employee ratios

L Profit per employee (th)	n.a.	n.a.
L Operating revenue per employee (th)	n.a.	n.a.
L Costs of employees / Operating revenue (%)	n.a.	n.a.
L Average cost of employee (th)	n.a.	n.a.
L Shareholders funds per employee (th)	n.a.	n.a.

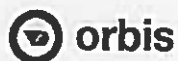


EXHIBIT 13

	31/12/2019	31/12/2018
	USD	USD
	12 months	12 months
	Local GAAP	Local GAAP
Exchange rate: BGN/USD	0.57438	0.58541
L Working capital per employee (th)	n.a.	n.a.
L Total assets per employee (th)	n.a.	n.a.

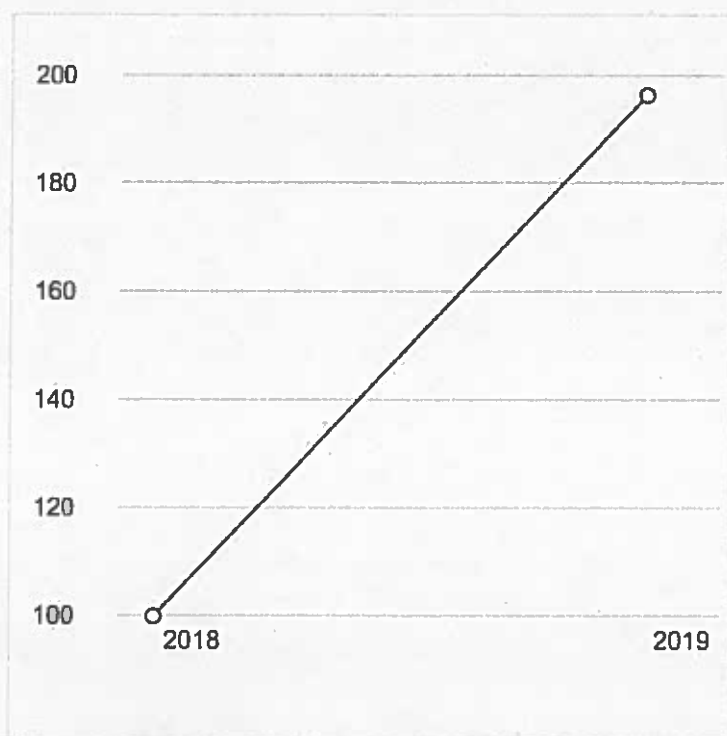
Graph - Value over time



Graph - Indices of several values over time



EXHIBIT 13



Base: 2018

● Total assets (USD)

585

Peer comparison

Accounting year: Peer group year	Year	Operating revenue (Turnover) th USD	P/L before tax th USD
Median		0	-2
Standard deviation		0	79
Average		0	-32

QUINLAN MOSKOVSKA EAD	2019	0	1	-280	11
VILLA ORLOV LLC EOOD	2019	0	1	-16	9
SMART ESTETIK EOOD	2019	0	1	-1	2
SANGRAUND PROPARTI EOOD	2019	0	1	-1	1
MEYK 2018 EOOD	2019	0	1	-1	2
SDE PROPERTIES EOOD	2019	0	1	-4	7
VIP GRUP SOZOPOL EOOD	2019	0	1	-2	6
CORNELIA RIZORT LTD EOOD	2019	0	1	-11	8
DIZAR STROY OOD	2019	0	1	-1	2
VV INVESTMENTS EOOD	2019	0	1	-28	10
REAL ESTATES INT LTD EOOD	2019	0	1	-2	5



EXHIBIT 13

Accounting year: Peer group year	Year	P/L for period [=Net income] th USD	Total assets th USD
Median		-2	241
Standard deviation		79	2,282
Average		-32	984

QUINLAN MOSKOVSKA EAD	2019	-280	11	7,816	1
VILLA ORLOV LLC EOOD	2019	-16	9	422	3
SMART ESTETIK EOOD	2019	-1	2	111	7
SANGRAUND PROPARTI EOOD	2019	-1	1	n.a.	
MEYK 2018 EOOD	2019	-1	2	281	5
SDE PROPERTIES EOOD	2019	-4	7	201	6
VIP GRUP SOZOPOL EOOD	2019	-2	6	91	9
CORNELIA RIZORT LTD EOOD	2019	-11	8	359	4
DIZAR STROY OOD	2019	-1	2	102	8
VV INVESTMENTS EOOD	2019	-28	10	456	2
REAL ESTATES INT LTD EOOD	2019	-2	5	1	10

Accounting year: Peer group year	Year	Shareholders funds th USD	Number of employees
Median		56	1
Standard deviation		1,792	0
Average		-473	1

QUINLAN MOSKOVSKA EAD	2019	-5,839	10	n.a.	
VILLA ORLOV LLC EOOD	2019	260	2	n.a.	
SMART ESTETIK EOOD	2019	111	5	n.a.	
SANGRAUND PROPARTI EOOD	2019	n.a.		1	1
MEYK 2018 EOOD	2019	256	3	n.a.	
SDE PROPERTIES EOOD	2019	193	4	n.a.	
VIP GRUP SOZOPOL EOOD	2019	-3	8	n.a.	
CORNELIA RIZORT LTD EOOD	2019	295	1	n.a.	
DIZAR STROY OOD	2019	-3	9	1	1
VV INVESTMENTS EOOD	2019	1	6	1	1
REAL ESTATES INT LTD EOOD	2019	-1	7	n.a.	

Peer group definition

Closest 10 international companies according to the Operating revenue (Turnover) of the subject company for the last available year (2019) amongst the standard peer group.

The standard peer group is based on NACE Rev. 2 industry classification: 6810 - Buying and selling of own real estate.

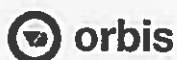


EXHIBIT 13

Company ratings

No data available for this company

Country ratings

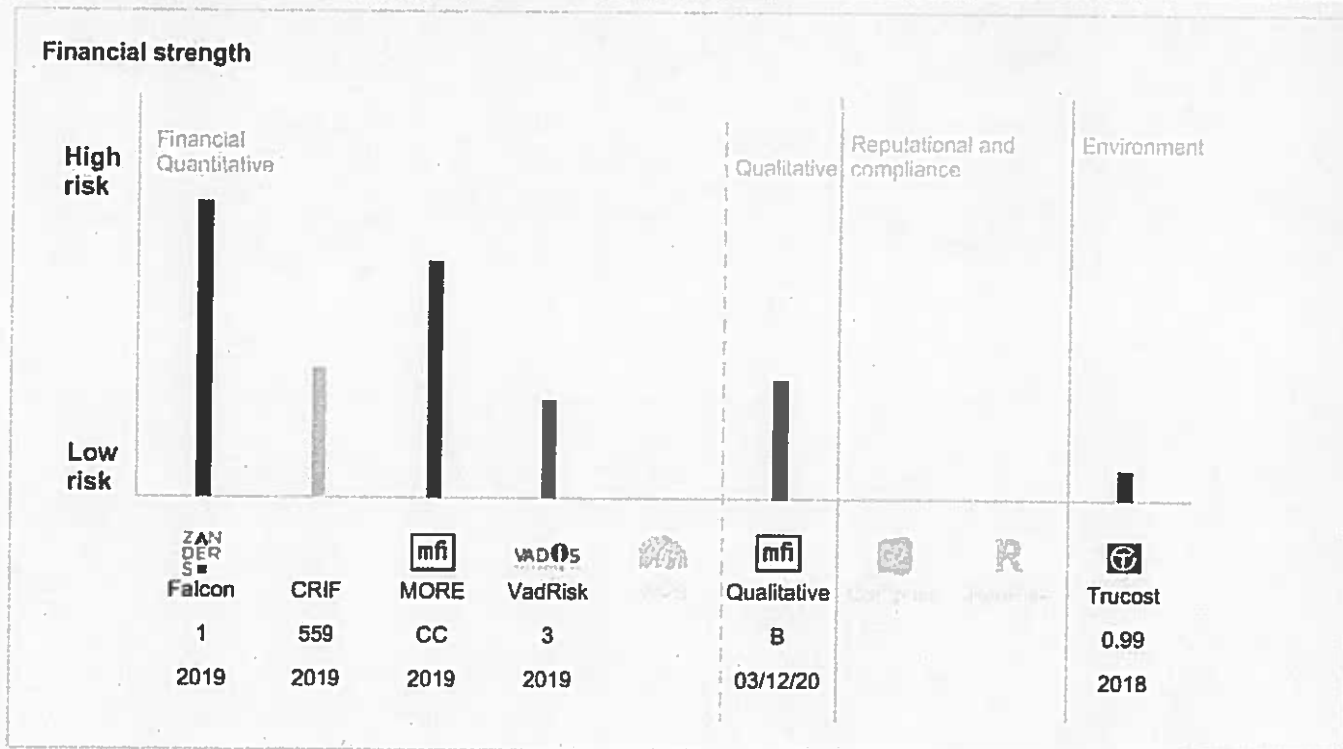
Your subscription does not include some of the agency ratings.

EIU

	Rating	Date	Action/Direction	Outlook	Watch
Overall country rating	BBB	01/09/2020			
Banking sector rating	BB	01/09/2020		Stable	

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Financial strength summary



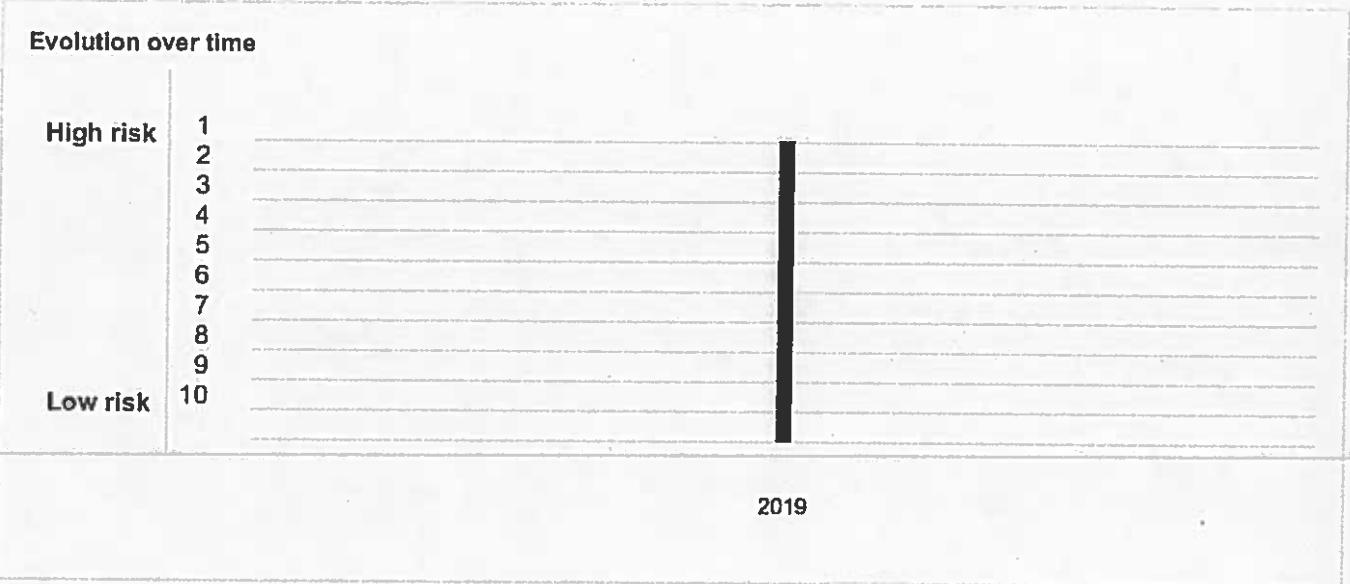
Falcon counterparty risk score by Zanders



EXHIBIT 13



Probability of default:	19.86%
Credit limit:	0 \$
Industry:	Real estate activities



Evolution over time (Tabular view)

	2019
Counterparty Risk Score (CRS)	1
Probability of default (%)	19.86
Falcon credit limit (\$)	0

Observation

2019 Original currency is not EUR



EXHIBIT 13

Falcon influencing ratios	
	2019
Operations and Liquidity	
Turnover growth	2
Return on sales	0
Current ratio	1
Debtor days	0
Debt services	
Interest coverage ratio	5
Debt/EBITDA	2
Capital structure	
Gearing	0
Solvency	0
Tangible net worth	0

Financial stability score by CRIF Decision Solutions Ltd

559
for 2019

Key influencing factors

- Financial leverage
- Profitability
- Asset management efficiency

Scores for peer group

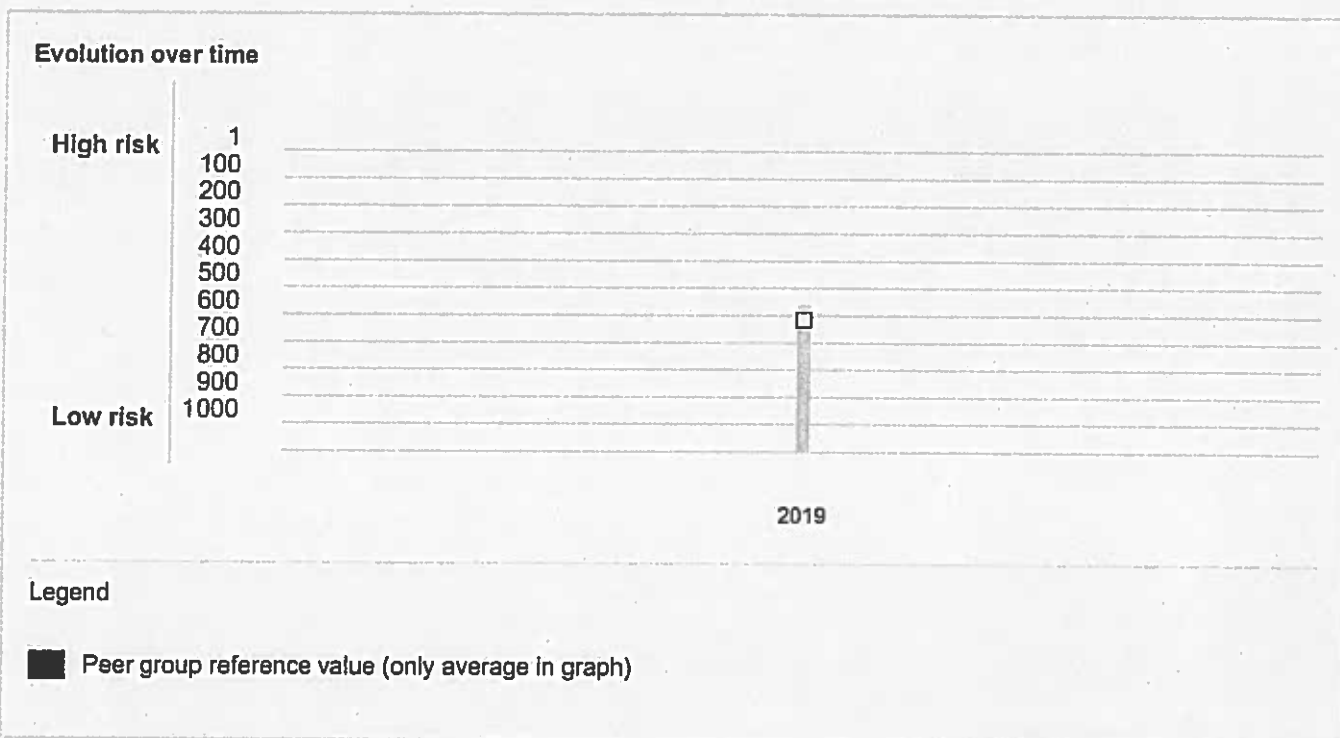
250 Minimum
614 Average
834 Maximum

Industry

Buying and selling of own real estate



EXHIBIT 13



Evolution over time (Tabular view)

	2019
Company	559
Key factors	<ul style="list-style-type: none"> - Financial leverage - Profitability - Asset management efficiency
Peer group	
Minimum	250
Average	614
Maximum	834

MORE credit risk score by modeFinance

CC - Risky

for 2019

Confidence level: 86%

Probability of default: 51.0%

Credit limit: 0 \$

Industry: Services

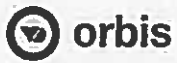
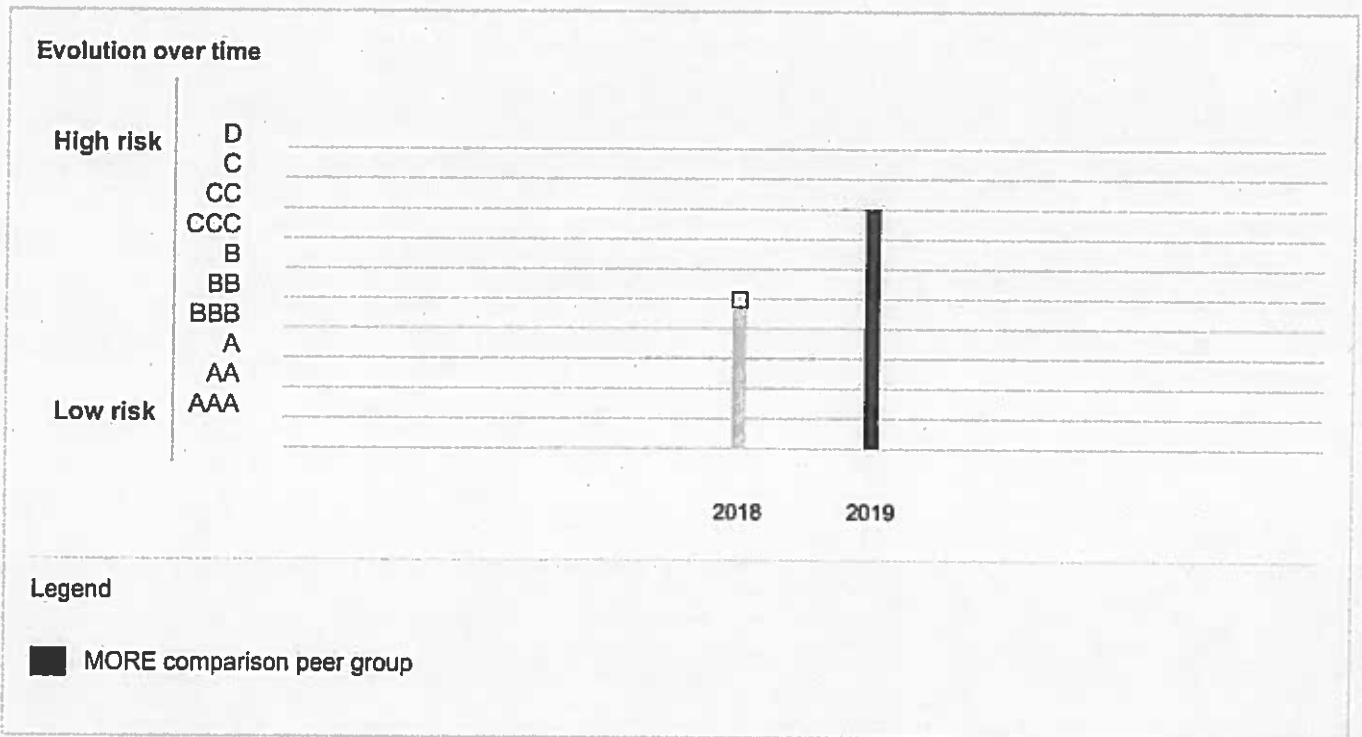


EXHIBIT 13



Evolution over time (Tabular view)

	2018	2019
Score		
Company	BB	CC
Peer group	BB	n.a.
Probability of default (%)		
Company	2.50	51.00
Peer group	1.90	n.a.
Confidence level (%)		
Company	52	86
Credit limit (\$)		
Company	1,145.00	0.00

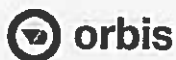


EXHIBIT 13

MORE influencing ratios

2018 2019

Solvency ratios

Leverage ratio

AAA	D
AAA	D

Assets to debt

Liquidity ratios

Current ratio

BBB	CCC
BBB	B
	C

Quick ratio

Cash conversion cycle (CCC)

Profitability and economic ratios

Return on investment (ROI)

--

Return on equity (ROE)

D

Asset turnover

D

Interest coverage ratio

Interest paid coverage

--

Predictive indicators by Vadis

Propensity of bankruptcy



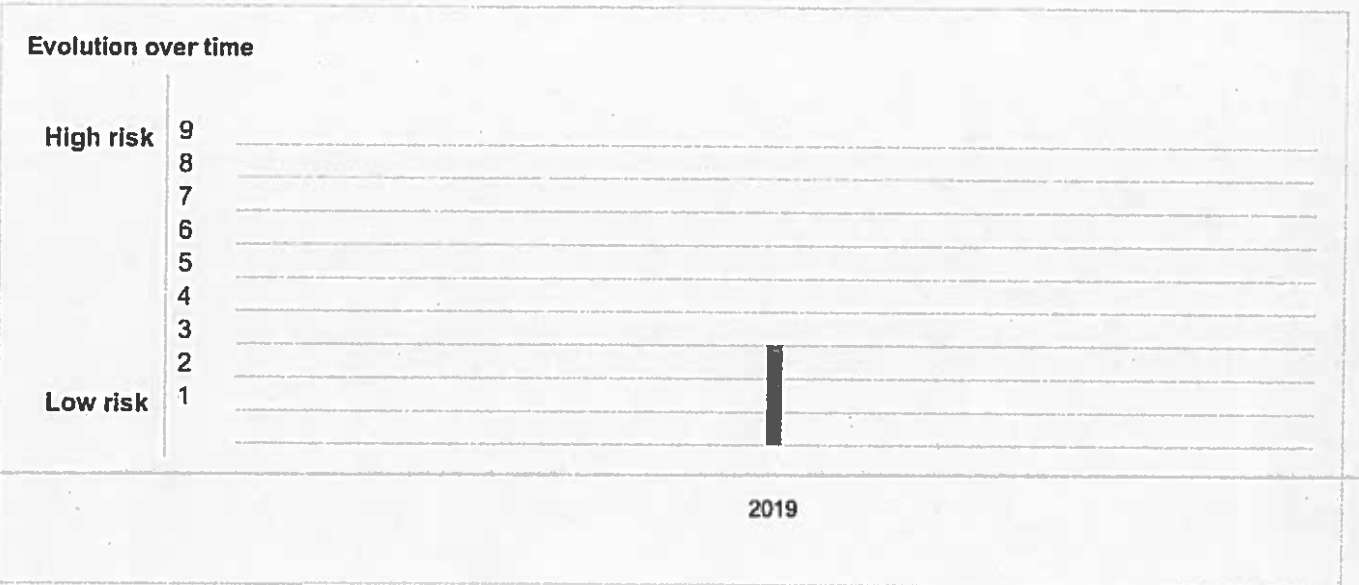
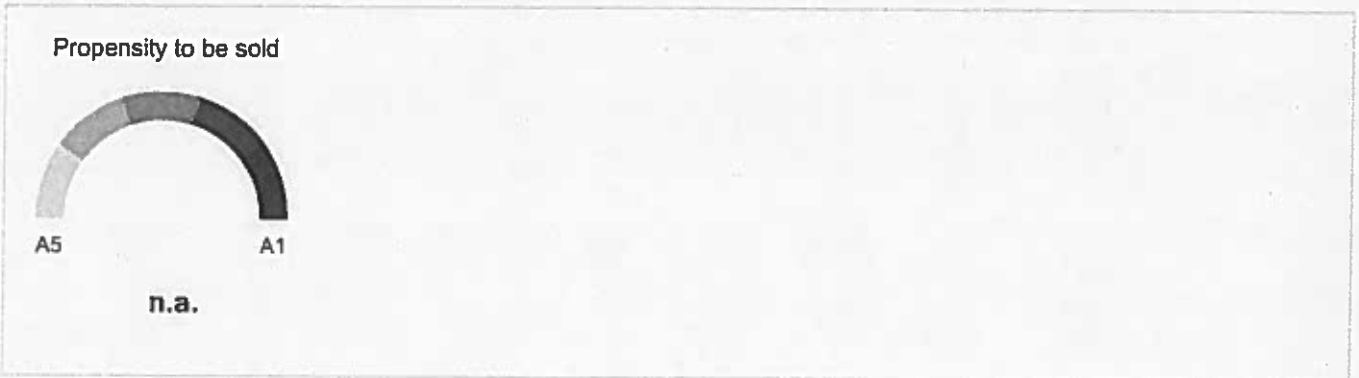
Risk of bankruptcy lower than national average
for 2019

Key influencing factors:

- + Evolution of loans / current liabilities
- + Evolution of costs of goods sold
- + Evolution of current ratio
- + Evolution of loans (company's sector financials)
- Company's ownership key performance indicators



EXHIBIT 13



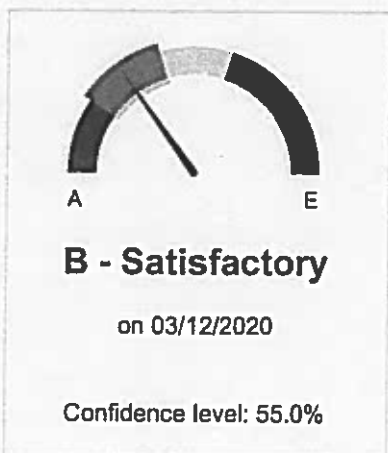
Evolution over time (Tabular view)

	2019
Propensity of bankruptcy	3
Key influencing factors	+ Evolution of loans / current liabilities
	+ Evolution of costs of goods sold
	+ Evolution of current ratio
	+ Evolution of loans (company's sector financials)
	- Company's ownership key performance indicators

Qualitative score by modeFinance



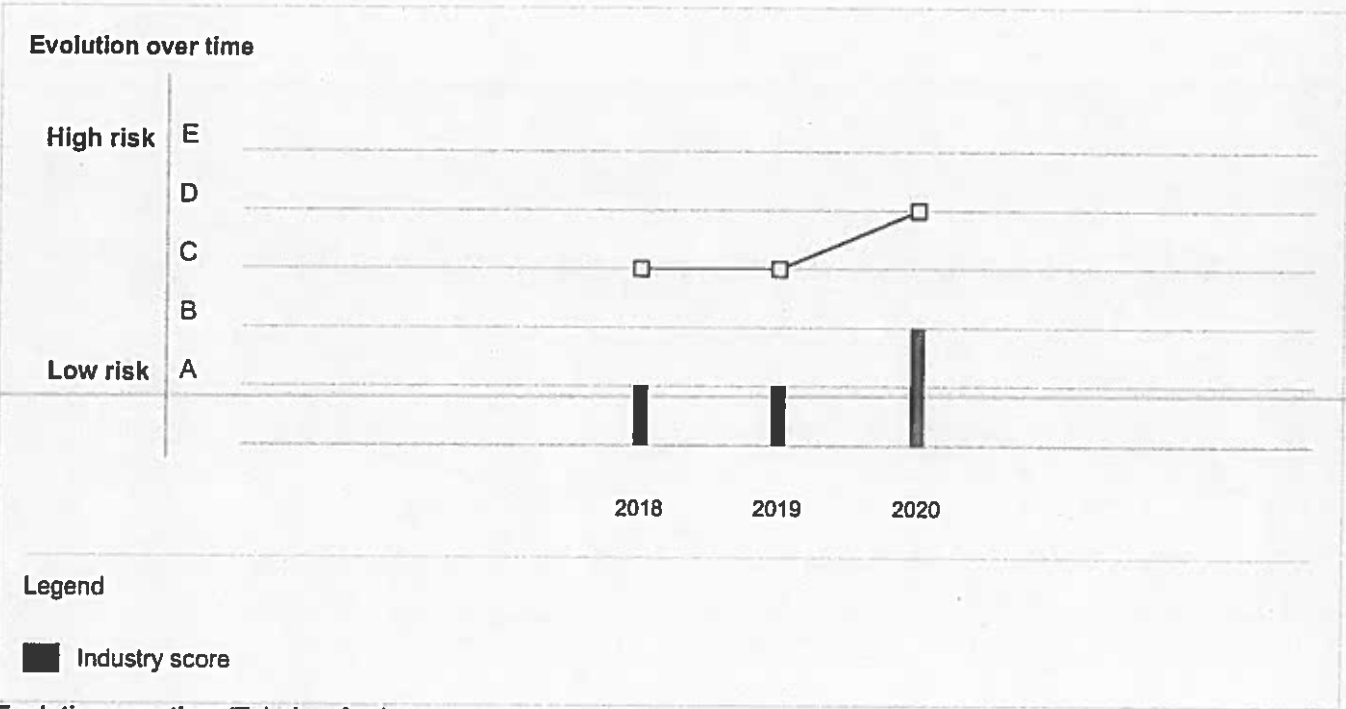
EXHIBIT 13



Credit limit: n.a.
No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.

Key influencing factors: A - GUO MORE score / status
C - Directors average MORE score / status
B - Size of the GUO

Industry score: D



Evolution over time (Tabular view)

	2018	2019	03/12/2020
Qualitative score	A	A	B
Confidence level (%)	38	54	55
Credit limit	n.a.	n.a.	n.a.
Industry score	C	C	D

Credit limit annotations

- 03/12/2020** No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
- 2019** No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.
- 2018** No Qualitative credit limit has been calculated because a recent MORE credit limit is available for this company.



EXHIBIT 13

Environmental score by Trucost

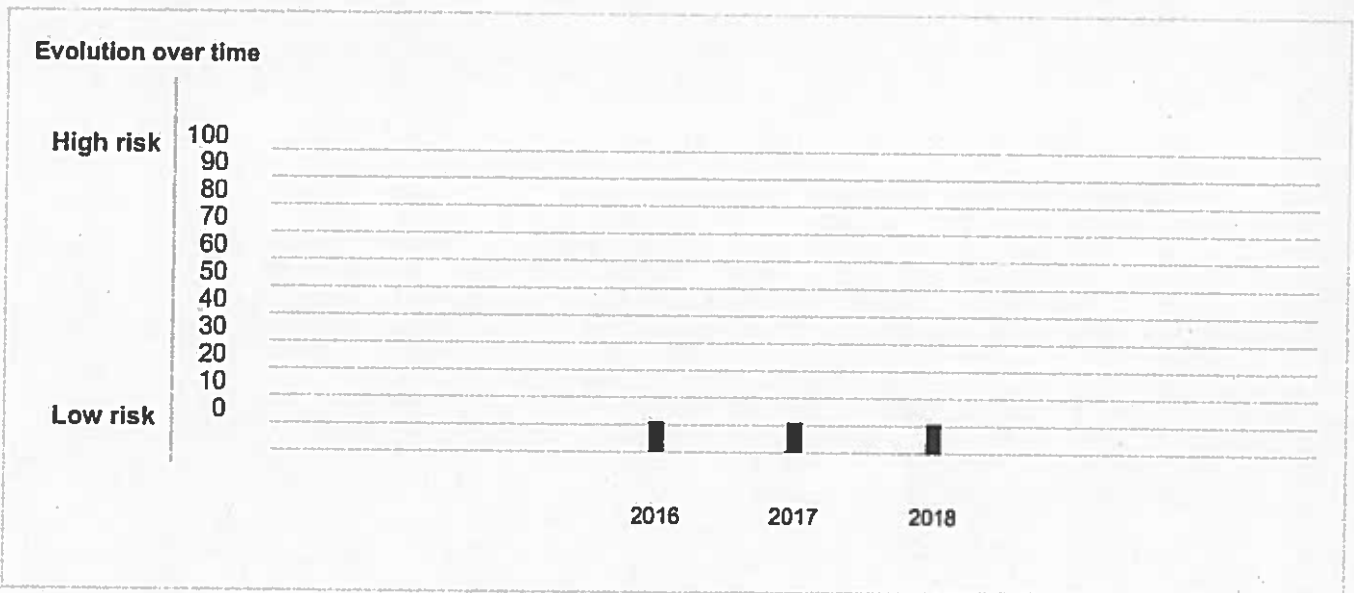
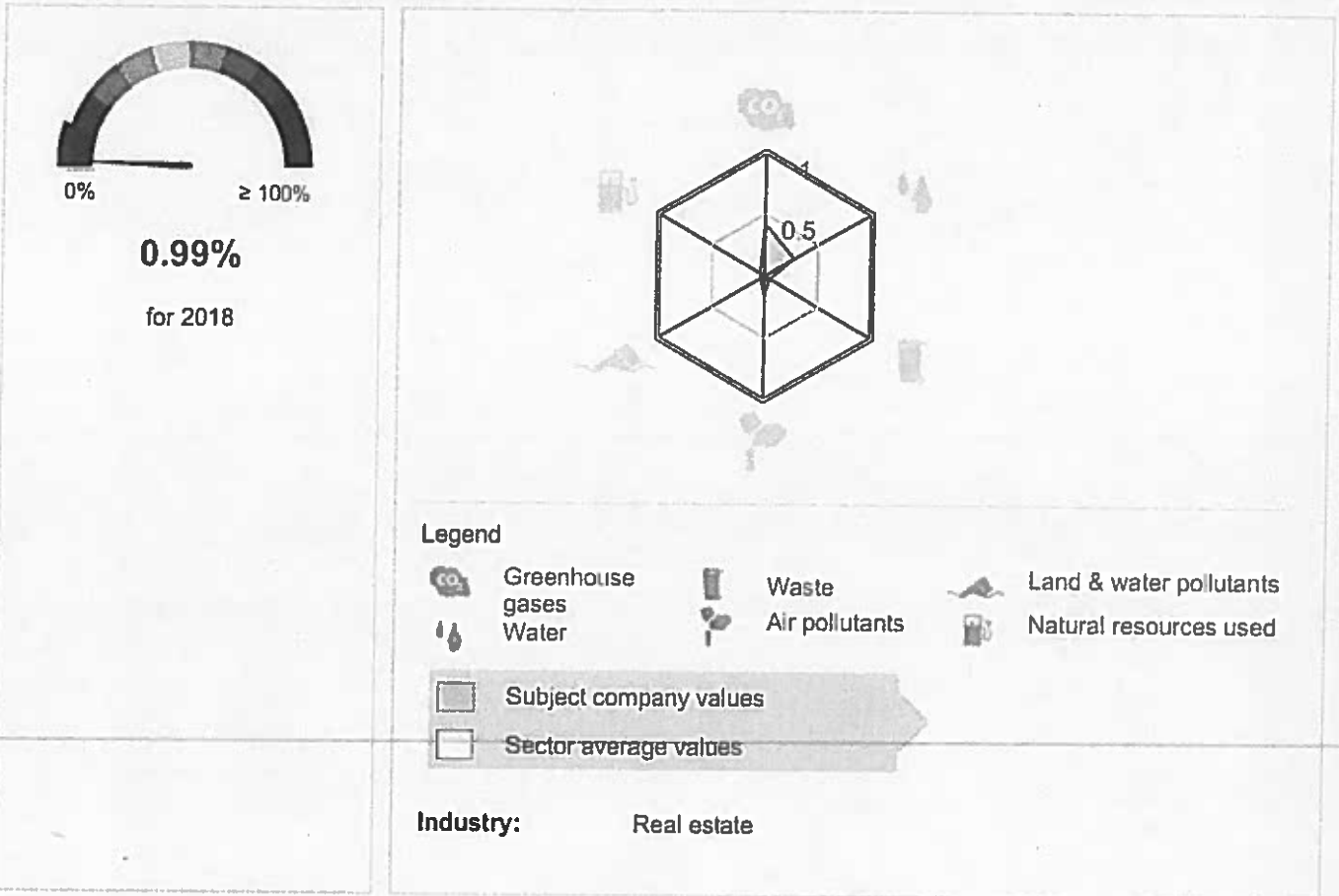




EXHIBIT 13

Evolution over time (Tabular view)

	2016	2017	2018
Environmental score (%)	0.91	0.97	0.99

Managed funds

There is no available data for this entity set

Current directors & managers

Management & staff 1

Senior Management

MR ALEKSANDAR KIRILOV GEORGIEV Executive Director	CB
---	----

Source

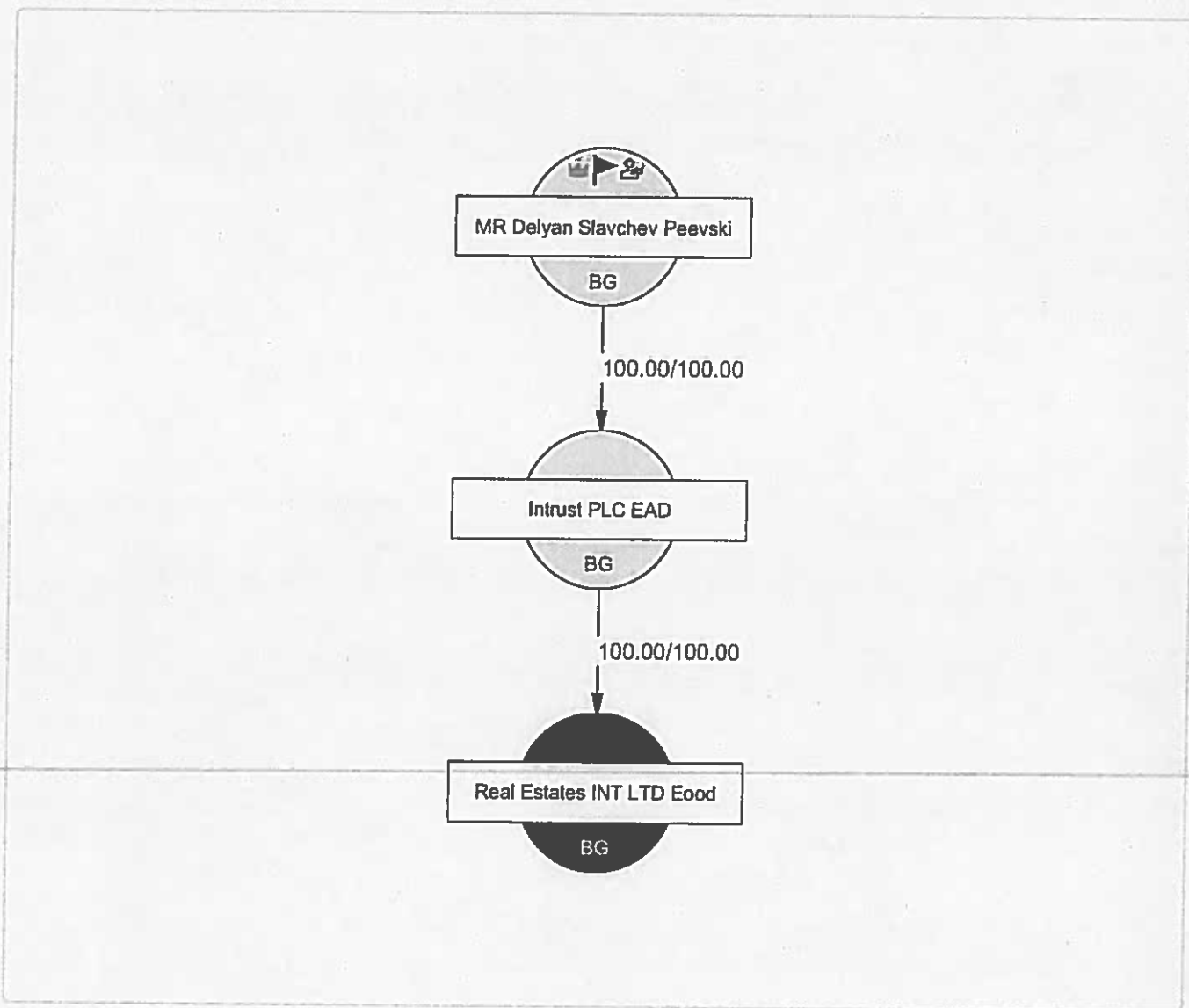
CB:Creditreform (Bulgaria)

Filters

Formal sources
Bodies & departments

Ownership structure

Graph : Shareholders



1 shareholder and the controlling shareholder path are represented.

Legend






- | | | | |
|---|--|------|--|
|  | Controlling shareholder | x/x | Direct / Total ownership % |
|  | An individual | BR | Branch |
|  | Beneficial Owner | CQP1 | 50% + 1 Share |
|  | Global Ultimate Owner | CTP | Calculated total percentage |
|  | There are names that are the same, or similar to, a risk relevant name | DM | Director/Manager |
| | | FC | Foreign company |
| | | GP | General partner |
| | | JO | Jointly owned, = 50 % |
| | | MO | Majority owned, > 50% |
| | | n.a. | Not available |
| | | NG | Negligible, <=0.01% |
| | | REG | Beneficial Owner from register, = 100% |



EXHIBIT 13

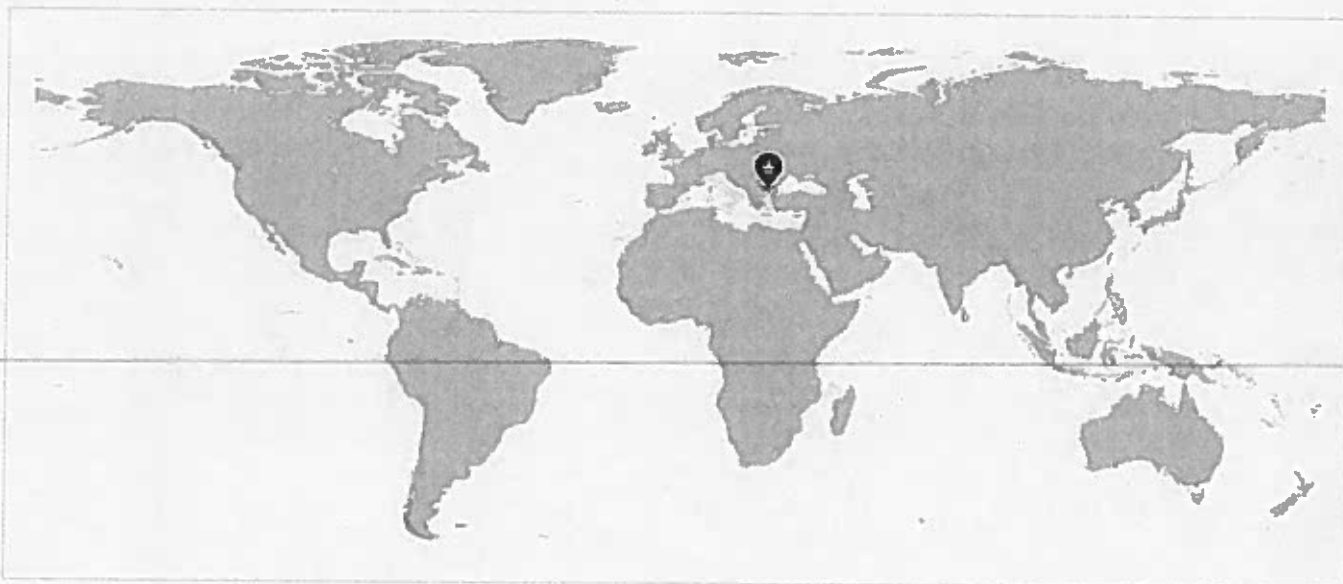
T	Sole trader, = 100 %
VE	Vessel
WO	Wholly owned, >= 98%

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%
 I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Geographic footprint

Number of companies in the corporate group per country



The map represents the geographic location of the companies in the corporate group

All 10 companies in the corporate group are represented

Legend

Number of entities by country

- More than 1
- Less than 1

Country of both the company and the GUO

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%
 I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Corporate group



EXHIBIT 13

There are 10 companies in the corporate group

Name	Country	Ownership		Level of own.	Info Source
		Direct %	Total %		

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	▶	BG				
----------------------------	---	----	--	--	--	--

Ultimately owned subsidiaries

INT LTD EOOD	▶	BG	100.00	100.00	1	CB
▼ INTRUST PLC EAD		BG	100.00	100.00	1	CB
L BM SYSTEMS EAD		BG	100.00	100.00	2	CB
L INT INVEST EOOD		BG	100.00	100.00	2	CB
L INTTRAFIK EOOD		BG	100.00	100.00	2	CB
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE		IT	100.00	100.00	2	HO
L REAL ESTATES INT LTD EOOD		BG	100.00	100.00	2	CB
▶ TELEGRAPH MEDIA EOOD		BG	100.00	100.00	2	CB
L TELEGRAPH NEWSPAPER LTD EOOD		BG	100.00	100.00	2	CB

Name

Date

Global Ultimate Owner

MR DELYAN SLAVCHEV PEEVSKI	▶	
----------------------------	---	--

Ultimately owned subsidiaries

INT LTD EOOD	▶	11/2020
▼ INTRUST PLC EAD		11/2020
L BM SYSTEMS EAD		11/2020
L INT INVEST EOOD		11/2020
L INTTRAFIK EOOD		11/2020
L NSN INVESTMENT ITALIA S.R.L. IN LIQUIDAZIONE		07/2019
L REAL ESTATES INT LTD EOOD		11/2020
▶ TELEGRAPH MEDIA EOOD		11/2020
L TELEGRAPH NEWSPAPER LTD EOOD		11/2020

Legend

▶ There are names that are the same, or similar to, a risk relevant name

Ultimate Owner definition





The path from the company to its Ultimate Owner is minimum 50.01%





EXHIBIT 13

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Beneficial Owners

Beneficial Owner (1)					
	MR DELYAN SLAVCHEV PEEVSKI Bulgaria	Distance: 2			
Name		Country	Ownership Direct %	Ownership Total %	Source
MR DELYAN SLAVCHEV PEEVSKI		BG	100.00	100.00	CB 11/2020
INTRUST PLC EAD		BG	100.00	100.00	CB 11/2020
REAL ESTATES INT LTD EOOD		BG			
Other Ultimate Beneficiary (0)					
This company has no Other Ultimate Beneficiaries.					
Beneficial Owner from register (0)					
There are no Beneficial Owners from register for this company					

Legend

-  There are names that are the same, or similar to, a risk relevant name
-  Has enough influence power to control the result of a vote in the company

Beneficial Owner definition

The minimum percentage of ownership at first level is 10.00%, the minimum percentage at further levels is 50.01%.

I also consider any individual at the top of a path who has an unknown percentage of ownership (% such as '>x%' are considered unknown)

I also consider any individual at the top of a path who has a percentage of minimum 10.00% (with the requested 50.01% at all other levels).

Beneficial Owners from register are not subject to the defined thresholds.

Controlling shareholders



EXHIBIT 13

BvD independence indicator

**D - Direct majority ownership**

Has an identified shareholder with over 50% direct ownership or is a branch/foreign company

Name	Country	Type	Ownership		Info		Op. Rev. (in USD)
			Direct %	Total %	Source	Date	
MR DELYAN SLAVCHEV PEEVSKI	▶ BG	I	100.00	100.00	CB	11/2020	-
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22
REAL ESTATES INT LTD EOOD	BG	C					0

Name	No of employees
MR DELYAN SLAVCHEV PEEVSKI	▶ -
INTRUST PLC EAD	29
REAL ESTATES INT LTD EOOD	n.a.

Legend

▶ There are names that are the same, or similar to, a risk relevant name

I = One or more named individuals or families

C = Corporate

Ultimate Owner definition

The path from the company to its Ultimate Owner is minimum 50.01%

I consider a company the Ultimate Owner if there are no identified shareholders or if the shareholder percentage is not known.

Current shareholders

Name	Country	Type	=	Ownership		Info		Op. Rev. (m USD)	No of employees
				Direct %	Total %	Source	Date		
INTRUST PLC EAD	BG	C	=	100.00	100.00	CB	11/2020	22	29

Legend

C = Corporate

Shareholders history

Current shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
INTRUST PLC EAD	BG	C	100.00	100.00	CB	11/2020	22	29

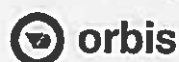


EXHIBIT 13

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)	No of employees
			Direct %	Total %	Source	Date		
			100.00	100.00	CB	03/2020		
			100.00	100.00	CB	09/2019		
			100.00	100.00	CB	03/2019		

Legend

C = Corporate

Previous shareholders

Name	Country	Type	Ownership		Info		Op. Rev. (m USD)
			Direct %	Total %	Source	Date	
NSN INVESTMENT OOD EOOD	BG	F	100.00	100.00	CB	10/2018	70
			100.00	100.00	CB	07/2018	
			100.00	100.00	CB	01/2018	

Name	No of employees
NSN INVESTMENT OOD EOOD	18

Legend

F = Financial company

Filters

Shareholders: All
All information since 01/2002

Shareholders by T-Rank

Name	Country	Type	T-rank (%)	Distance	Raw data	
					Direct (%)	Total (%)
INTRUST PLC EAD	n.a.	C	100.00	1	100.00	
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	100.00	2		

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

C = Corporate

I = One or more named individuals or families

Filters

All shareholders
T-Rank threshold 5%



EXHIBIT 13

Sorted by T-rank percentage

Shareholder power & coalitions

Most influential shareholders

Name	Country	Type	Distance	Influence power (%)
INTRUST PLC EAD	n.a.	C	1	100.0
MR DELYAN SLAVCHEV PEEVSKI	n.a.	I	2	100.0

Possible controlling coalitions

Controlling coalitions do not apply because there is a shareholder with enough influence power to control the result of a vote in the company: MR DELYAN SLAVCHEV PEEVSKI.

Based on Bureau van Dijk ownership data: 09/12/2020

Legend

- C Corporate
I One or more named individuals or families

Research

Company profiles

Filters:

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

No data available for this company

Industry profiles

Source	Document	Type	Date
MarketLine Company operates in the industry	Global Real Estate	Industry profile	09/06/2020
	Global Real Estate		20/06/2019
	Global Real Estate		11/04/2018
	Global Real Estate		26/05/2017
	Global Real Estate		26/05/2017

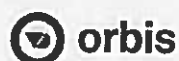


EXHIBIT 13

	Global Real Estate		25/07/2016
	Global Real Estate		05/11/2015
	Global Real Estate		01/06/2014
	Global Real Estate		01/06/2014
	Global Real Estate		01/03/2009
	Global Real Estate		01/04/2008
	Global Real Estate		01/03/2007
	Global Real Estate		01/04/2006
	Global Real Estate		01/05/2005
	Global Real Estate		01/08/2004
	Global Real Estate		01/12/2003
MarketLine Company operates in the industry	Real Estate in Europe	Industry profile	09/06/2020
	Real Estate in Europe		20/06/2019
	Real Estate in Europe		11/04/2018
	Real Estate in Europe		26/05/2017
	Real Estate in Europe		26/05/2017
	Real Estate in Europe		25/07/2016
	Real Estate in Europe		05/11/2015
	Real Estate in Europe		01/06/2014
	Real Estate in Europe		01/06/2014

Industry profiles Filters

Moody's Investors Service, Moody's Analytics Capital Markets, MarketLine, Morningstar, GlobalData

My variables

Unconsolidated, Local registry filing
No data available for this company

Appendix – Omitted chapters



EXHIBIT 13

The chapters listed below have been omitted because they have no data for this company, or the data cannot be represented in the PDF

Public tenders
 Detailed format
 Cash flow statement
 Segment data - Business lines
 Segment data - Geographic segments
 Graph - company ratings over time
 Global score by WVB
 Albatross score by Zanders
 Compass score merchant risk by G2
 RepRisk indicators by RepRisk
 National scores
 Stock profile
 Annual stock data
 Annual stock valuation
 Pricing series
 Beta and price volatility
 Earnings estimates
 Additional estimates
 Brokers recommendations
 Bonds and loans
 Credit default swaps
 Previous directors & managers
 Current auditors, bankers & other advisors
 Previous auditors, bankers & other advisors
 Current subsidiaries
 Branches
 Innovation strength
 Patent portfolio
 Royalties agreements
 Company and market news
 FACTIVE news
 Mergers & acquisitions
 Crossborder investments
 Liquidity events & potential beneficiaries
 Local registry documents
 aRMadillo
 Global reports
 EOL SEC filings

Exhibit 14 Withheld in Full

Bates: GLOMAG-23653 0309–0311

Exhibit 15 Withheld in Full

Bates: GLOMAG-23653 0312–0328

Exhibit 16 Withheld in Full

Bates: GLOMAG-23653 0329-0347

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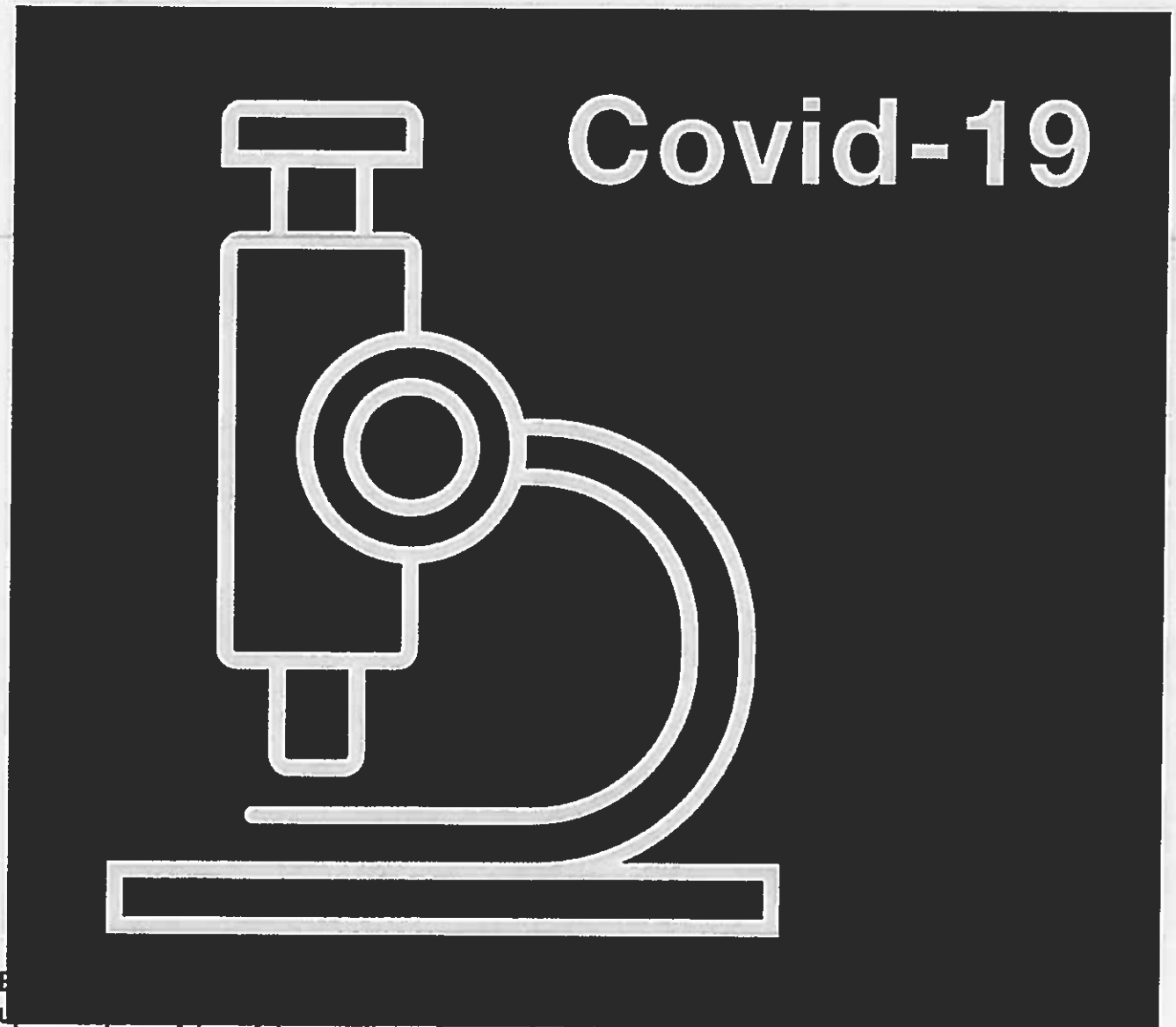
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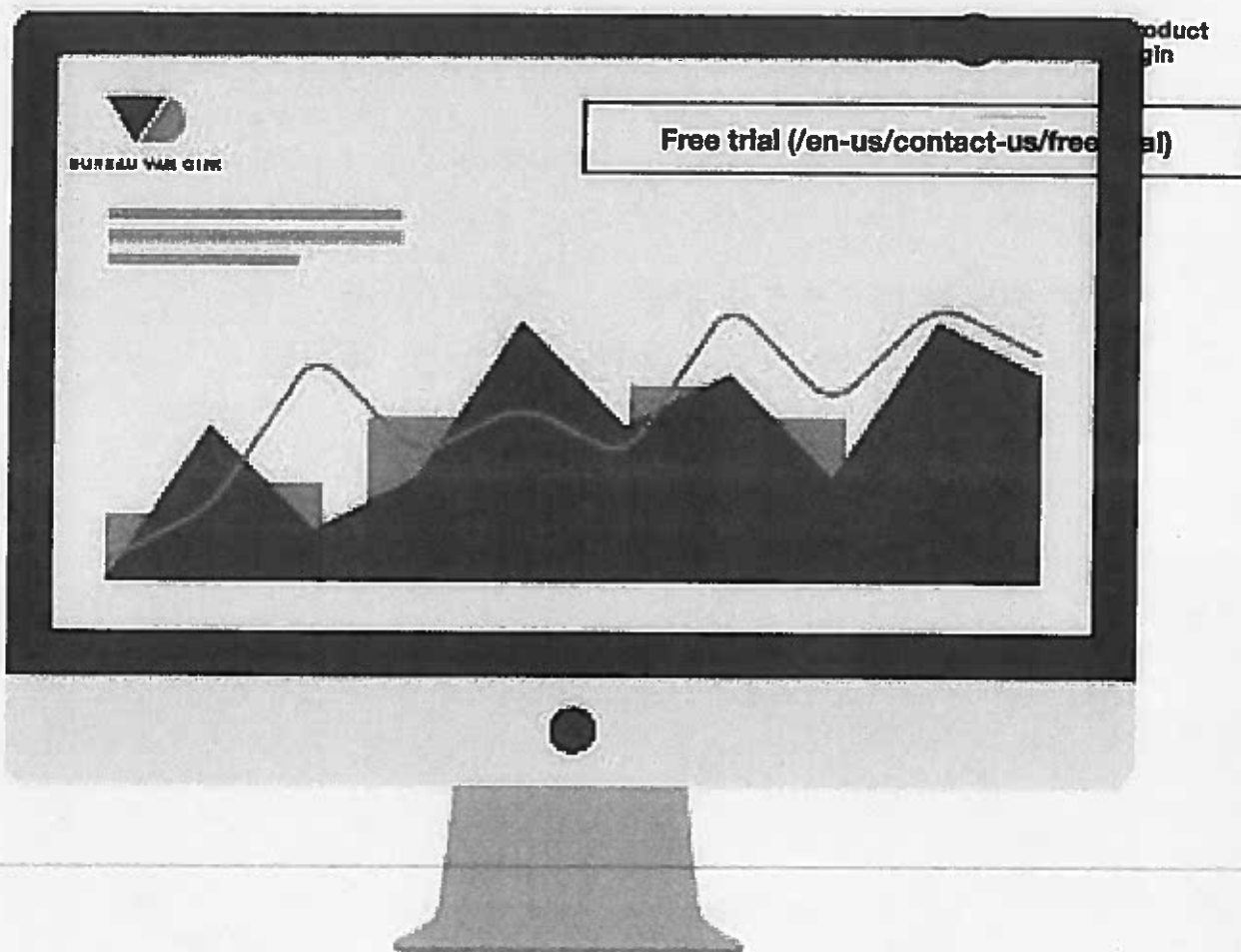
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Corporate finance and M&A

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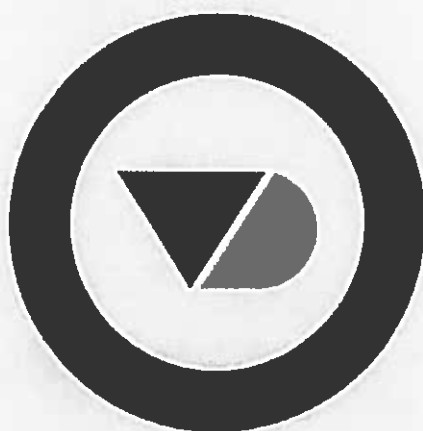
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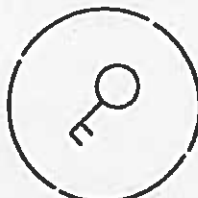
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Global Reference Solution for Government

1.

When commercial awareness is government business

Through the Global Reference Solution (GRS) for Government platform, analysts gain access to the Dun & Bradstreet Data Cloud, the world's most comprehensive business data and analytics.



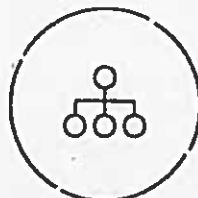
330+ Million Businesses

Access to over 50 fields of data on over 330 million global private and public businesses



Executive Contact Info

Daily updates to information on over 100 million decision-making executives and employees across the globe



Corporate Family Trees

Information on all direct and indirect subsidiaries of complete global family trees

Uncover relationships between individuals & businesses

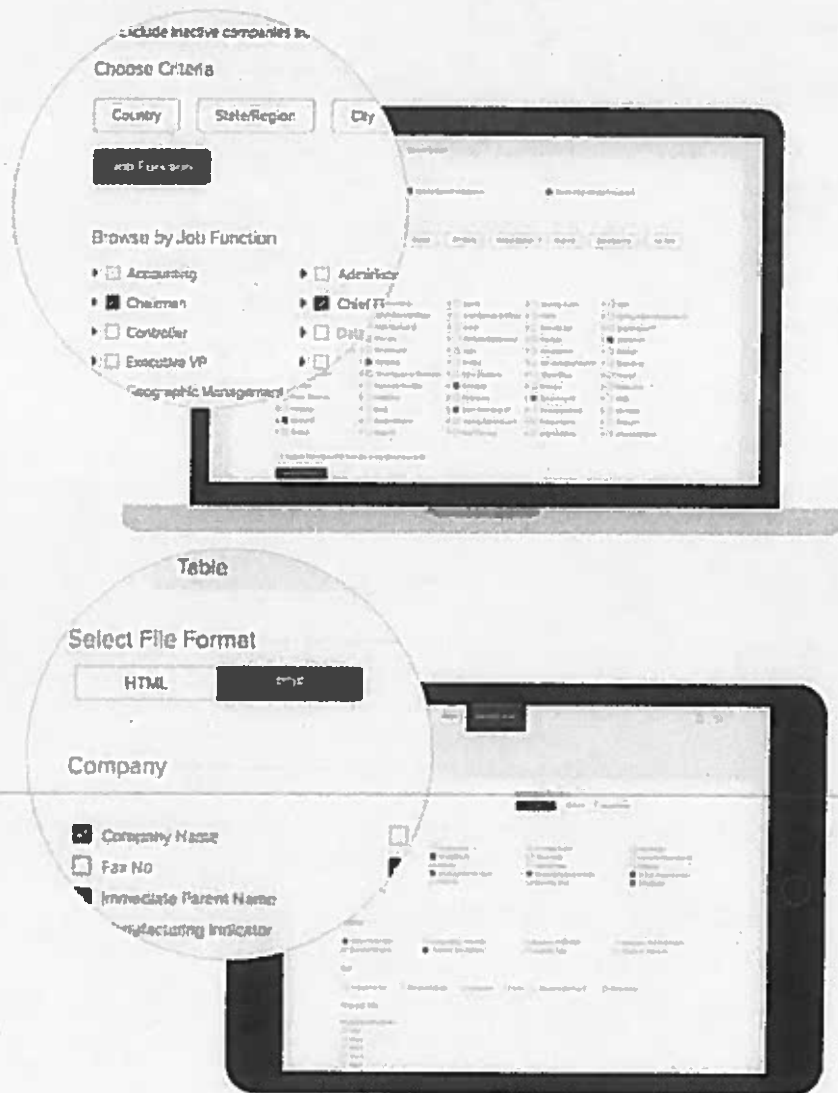
Fundamental, mission-advancing insights can be derived by linking business activity to individuals that operate and fund businesses. GRS for Government provides job titles, contact information, photos, and

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biographies for key executives and directors, and in many cases helps to identify lower level personnel.



Easy search interface & exporting functionality

Query the database using any single criterion or combination of search criteria including company name, industry classification, executive name, address (city, state, region, etc.). Easily create and export customized reports and search results into Microsoft Excel and Word, Adobe Acrobat, CSV, or HTML. Charts can be exported into PNG, PDF, and SVG formats.

Enable iterative 'broad-to-narrow' research

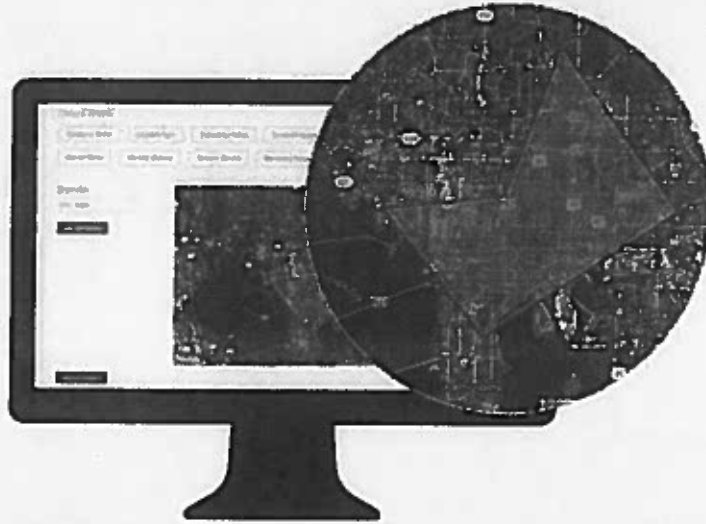
Research work isn't always linear, which is why GRS for Government allows users to jump start research wherever it is convenient. A search may begin with a SIC Code industry search and reveal

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meaningful location-specific trends discovered by radius searching with zip code parameters, locating specific points on a map, or creating custom geographic zones with the geo mapping feature.



- Discover

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Exhibit 20 Withheld in Full

Bates: GLOMAG-23653 0383–0399

Exhibit 21 Withheld in Full

Bates: GLOMAG-23653 0400-0413