

OPINION

on the dissertation for the award of the educational and scientific degree of **DOCTOR with candidate Stefan Angelov Peshov, doctoral student in the doctoral program "Finance, Money Circulation, Credit and Insurance" (Finance)**

by **Prof. Dr. Reneta Marinova Dimitrova, New Bulgarian University**

Subject: Dissertation on the topic "Prevention of tax fraud in the trade of fuels and petroleum products in Bulgaria", with scientific supervisor Assoc. Prof. Dr. Lyudmil Boyanov Krastev

The opinion is presented in accordance with Order No. 349 of 29.04.2026 of the Rector of the "D. A. Tsenov" University of Economics - Svishtov

I. General presentation of the dissertation work

The object of the research in the dissertation is the cases of illegal actions in tax practices in the trade in fuels and petroleum products. As for the subject, these are the ways to limit and prevent tax fraud in the sector of trade in fuels and petroleum products.

The dissertation has a classic structure, consisting of an introduction, three chapters, a conclusion and literature. It is developed in a volume of 167 standard pages. The good illustration of the issues under consideration with 12 figures and 26 tables is impressive.

The dissertation is presented to the scientific community in 4 independent publications - two articles and two reports. They are fully sufficient to fulfill the minimum national requirements for awarding the ONS "doctor".

Doctoral student Peshov has studied a significant volume of scientific literature, the list of which includes 100 sources, which indicates his in-depth awareness of the topic under consideration.

II. Assessment of the form and content of the dissertation

The dissertation is dedicated to a topic of undeniable relevance. As PhD student Peshov points out, tax fraud is one of the serious challenges facing the European Union and its member states, which leads to huge losses of public money. Fraudulent fuel schemes are part of this vicious practice, which must be actively worked against and this is the focus of the dissertation.

The author of the dissertation shows good skills in handling scientific concepts. The style is understandable and with the necessary logical consistency and coherence of the presentation. The presented dissertation shows that PhD student Peshov has in-depth knowledge of the trade in fuels and petroleum products and, respectively, of tax fraud in this trade.

The abstract corresponds to the content of the dissertation and from reading it one gets an idea of the scientific research carried out by the PhD student.

III. Scientific and applied contributions of the dissertation work

The reference for the contributions in the dissertation work is announced as a part of the abstract. My assessment of the contributions is that they are substantial and present the scientific and scientifically applied qualities of the dissertation work. The more significant of them are:

First. The doctoral student's theoretical contribution is the research on the role and importance of indirect tax revenues, with the emphasis on the problems regarding excise duties in Bulgaria, which, according to the doctoral student, are relevant for the European Union, the legislative bodies, the executive branch, the financial administration, taxpayers and consumers of excise goods.

Second. The doctoral student's theoretical contribution is also the critical analysis of the scientific literature that studies the tax system, mainly in terms of the national-economic dimension.

Third. The analysis of the controls to combat fraud, which are assessed as insufficiently effective, can be defined as a contribution of a scientific-applied nature, and solving this problem requires, according to doctoral student Peshov, the creation of a new effective program to prevent fraud with fuels and petroleum products in Bulgaria.

Fourth. The contribution of an applied nature is the proposal to introduce a tax on fuels within the framework of a system of additional allowances, which will avoid additional administrative costs for the creation of a new tax authority in Bulgaria.

IV. Questions on the dissertation

I have no significant critical remarks on the dissertation. In places there is something to be desired regarding the style of the presentation in the abstract and in the dissertation. I would like doctoral student Peshov to explain the scheme by which criminals take advantage of the difference between high-priced taxable fuels and low-priced subsidized fuels.

V. General assessment of the dissertation and conclusion

Based on all of the above, it can be concluded that PhD student **Stefan Angelov Peshov** has very good theoretical and practical preparation on the topic of the dissertation, shows the ability to identify important problems at a methodological and practical-applied level and to conduct independent scientific research. As a member of the scientific jury, I will vote with conviction for awarding the educational and scientific degree "doctor" to PhD student **Stefan Angelov Peshov**.

04.06.2026

Prepared by: Prof. Dr. Reneta Dimitrova