

# PLATFORM OF EUROPEAN MEMORY AND CONSCIENCE

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To  
Mr Tsvetan Tsvetanov  
Minister of Interior  
Ministry of Interior of the Republic of Bulgaria  
29, Shesti Septemvri Str.  
1000 Sofia  
BULGARIA

**President:**  
Göran Lindblad  
**Executive Board:**  
Siegfried Reiprich  
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**Managing Director:**  
Neela Winkelmann

**Members:**  
21 institutions and  
organisations  
from 13 EU  
Member States

Strasbourg, 13 February, 2012

Dear Minister Tsvetanov,

Hereby, I am addressing you on behalf of the **Platform of European Memory and Conscience**, an international non-profit association founded on 14 October, 2011 in Prague under the auspices of the Czech Prime Minister Mr Petr Nečas by 20 governmental and non-governmental institutions and organisations from 13 EU member states working in the field of coming to terms with the totalitarian legacy of Europe. The establishment of the Platform was endorsed by the European Parliament and by the EU Council under three Presidencies. The goals of the Platform of European Memory and Conscience are, among others, to increase public awareness about European history and the crimes committed by totalitarian regimes, to encourage a European-wide discussion about the causes and consequences of totalitarian rule and to help prevent intolerance, extremism, anti-democratic movements and the recurrence of any totalitarian rule in the future.

In January, the Platform of European Memory and Conscience was approached by Mr Evtim Kostadinov, Chairman of the Committee on the Disclosure of the Documents and Announcing Affiliation of Bulgarian Citizens to the State Security and the Intelligence Services of the Bulgarian National Army (COMDOS) in a letter formally requesting the admission of COMDOS as a Member of the Platform of European Memory and Conscience. According to the Statute of the Platform, organisations wishing to apply for membership must sign an important document – the **Code of the Platform** declaring, among others, that the candidate organisation *does not knowingly employ former members or collaborators of repressive forces of totalitarian regimes or former functionaries with paid jobs in totalitarian political structures, in paid or unpaid functions*. Mr Kostadinov enclosed a signed copy of the Code of the Platform which we are forwarding to you with this letter.

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The Platform of European Memory and Conscience is an interest association of legal persons founded according to the Civil Code of the Czech Republic and registered at the City Hall of Prague under reg.-No. 23/11. Id.-No.: 72559071.

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Dear Minister, the fact that Mr Kostadinov applied for a membership in the Platform and signed its ethics code on behalf of COMDOS comes as a surprise to us and we are hereby kindly asking you for an explanation. According to our knowledge, several members of COMDOS do not fulfill the criteria listed in the Code of the Platform, including, most importantly, Mr Kostadinov himself. We are taking the liberty to present the information available to us about four of the nine members of COMDOS elected in 2007 by the Bulgarian Parliament. According to our information,

Mr Apostol Dimitrov, Member of COMDOS

was first secretary of the Comsomol (the Communist party youth organisation) in Varna and secretary of the Varna city committee of the Bulgarian Communist Party in 1974 – 1989;

Mr Georgi Georgiev, Member of COMDOS

was a Functionary of the Comsomol and the Bulgarian Communist Party in Sofia in 1980 – 1990;

Ms Tatyana Kiryakova, Member of COMDOS

was head specialist in the Institute for the History of the Bulgarian Communist Party before 1989; and

Mr Evtim Kostadinov, Chairman of COMDOS

graduated from the High School of the Ministry of Interior in 1986 with a specialisation in „safeguarding public order and security“. Until 1989, he was Captain of the Narodna Militsia (Peoples' Militia) in the town of Dobrich. It is a very well known fact that the Peoples' Militia was used by the communist dictatorship as a supporting force in the repressions against dissidents and opponents of the regime. In the Bulgarian Act on the Peoples' Militia it was stipulated, e.g., that members of the Peoples' Militia could shoot and kill people in the area of the state border. The Peoples' Militia was used for example to disperse mass demonstrations of the Turkish minority against the forced assimilation in North – Eastern Bulgaria, including the area of Dobrich, in May 1989 when 9 protesters were killed.

If the information listed above is true, then Mr Kostadinov was by no means entitled to sign the Code of the Platform. In doing so, he has tried to deceive our international association. Besides being wholly unacceptable to us, this also raises questions about the integrity of Mr Kostadinov as the Chairman of COMDOS.

Dear Minister, we would like to stress that we welcome and support the establishment, by the Bulgarian government, of COMDOS and its purpose – to provide full access of the democratic Bulgarian society to the archives of the security services of the communist dictatorship. Only through the opening of these formerly classified archives can we understand and draw lessons from the true nature of the totalitarian regimes.

The Platform of European Memory and Conscience would be pleased to invite COMDOS to become its Member. However, the current personnel situation of COMDOS prevents us from doing so.

Therefore, may we kindly suggest that the Bulgarian Parliament elect new members of COMDOS who, in the past, were neither members of the repressive forces of the communist dictatorship nor functionaries of the political structures of the communist regime. This would certainly be in the interest of the victims of the dictatorship and their families, researchers, journalists and other members of the public who come to COMDOS to seek and study documents about the non-democratic past.

Based on the experience of our Members who have visited COMDOS, may we also kindly suggest that the reading room of COMDOS be enlarged so that a sufficient amount of study places are offered to the public, more than the current six, and that the catalogue to the COMDOS archive be made widely accessible, if possible on the internet, so that also researchers from farther away and from abroad might get acquainted with the collections. This would further improve the capacity of COMDOS to fulfill its important and invaluable mission.

We thank you very much for your attention to this letter and for your kind reply.

Wishing you continuing success in your work I remain,

Yours faithfully,

Göran Lindblad

President

**Attachments:**

- Letter by Mr Kostadinov on behalf of COMDOS applying for membership in the Platform of European Memory and Conscience
- Code of the Platform signed and stamped by Mr Kostadinov on behalf of COMDOS
- Agreement establishing the Platform of European Memory and Conscience and the Statute of the Platform of European Memory and Conscience