

POSSESSION – IT IS POSSIBLE TO INHERIT AS FACTUAL RELATIONSHIP?

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Abstract

This present report will focus on possession and on whether it is capable of being inherited. It will examine the question of whether possession may be inherited as a fact, under what prerequisites, and whether a transfer of possession or an accession of the factual relationship is required. Of particular interest is whether the effect in rem of acquisitive prescription will arise where the heir invokes a period of acquisitive prescription that has run in favor of his testator/intestate predecessor, but after he himself has lost possession of the property for more than six months.

Key words: *Possession, Inheritance, Factual relationship, Property, Acquisition of rights, Accession*

Introduction

This paper focuses on possession and examines whether it may be inherited as a factual relationship. As a factual relationship, the possession constitutes the exercise of factual control over a thing that the possessor holds either personally or through another as their own. Pursuant to Article 68¹ of the Bulgarian Property Act, possession constitutes dominion over a thing; therefore, it is a matter of fact rather than a subjective right. The estate of a deceased person encompasses all transferable proprietary rights and obligations, copyright, the succession of membership in a cooperative or commercial company, membership rights in housing construction cooperatives, the inheritance of a sole trader enterprise, as well as possession as a factual relationship. The paper analyses whether possession may be inherited as a factual state, under what conditions such inheritance may occur, and whether it

¹ Vasilev, L., Bulgarian Property Law, St. Kliment Ohridski University Press, Sofia, 1995, p. 324; compiled, scientifically edited, and reviewed by Corresponding Member Prof. Dr. Chudomir Goleminov

requires a transfer of possession or the tacking of successive periods of factual control. The requirement of continuity of possession raises the question of whether possession as actual control may be inherited, that is, acquired on the basis of universal succession. Furthermore, it necessitates an examination of whether possession, as a factual relationship, forms part of the estate and is therefore capable of transmission upon succession.

1. Possession

Possession has been known since ancient times and predates property law, as it is inherently linked to the ability to exercise factual control over objects. In possession, an individual relies on the actual (physical) control exercised over a thing, irrespective of whether he or she holds a legally recognised real right in respect of that property. Through the exercise of dominion over the object, individuals satisfy their interests and needs. With the evolution of economic, political, and social conditions, both society and the legal system have undergone significant development. Although possession constitutes merely factual control over a thing, the law does not remain indifferent to it. On the contrary, possession is recognised as a legal institution capable of giving rise to the acquisition of ownership. Roman law afforded legal protection to possession, thereby establishing its enduring significance within the legal order. The term *possessio* originates from Roman law. Etymologically, it is derived from two Latin elements: *potis*, meaning "powerful" or "mighty," and *sedere*, meaning "to sit" or "to establish oneself permanently."² The concept has become firmly established in both legal scholarship and judicial practice. In Bulgarian law, the legal remedies available for the protection of disturbed or dispossessed possession are referred to as **possessory actions**.

Possession is recognised in all legal systems.³ However, with the digitalisation of society and the increasing integration of artificial intelligence into everyday life, the traditional concept of the exercise of factual control over a tangible object is becoming progressively more difficult to conceptualise. The digital sphere stands in contrast to the material world, in which possession has traditionally been understood as the exercise of actual physical control. The continuous advancement of technology and the emergence of new forms of property give rise to the possibility of **technologically mediated possession** and, in the future, even the partially autonomous exercise of factual control through AI systems. These developments inevitably raise novel legal questions concerning the very notion of a "thing," the possible existence of digital property, the manner in which such property may be possessed and by whom, and whether it may constitute an object of inheritance as a factual relationship?

² Andreev, M. Roman Law, 1971, p. 184

³ Article 2228 of the French Civil Code, Paragraph 854 of the German Civil Code, and Article 1140 of the Italian Civil Code are to the same effect.

The legal concept of possession, as defined in Article 68 of the Bulgarian Property Act, comprises two cumulative elements: **corpus** and **animus**. This paper further examines the additional characteristics of possession that were expressly regulated in Article 302 of the repealed **Property, Ownership and Servitudes Act (ZISS)**. According to that provision, for possession to be regarded as lawful, it had to be continuous, uninterrupted, peaceful, open, unequivocal, and undisturbed.⁴ Lawful possession should be understood as possession capable of giving rise to legal rights and legal consequences. Conversely, where possession does not satisfy the requirements of lawful possession, it cannot serve as a factual relationship capable of being transmitted by succession.

Possession is regarded as **continuous** where the possessor consistently exercises factual control over the thing, does not alter the intention to possess it as his or her own (*animus domini*), manifests a sustained intention to possess, and, where necessary, seeks legal protection against any disturbance or dispossession. For ownership to be acquired by acquisitive prescription, it is not sufficient that the possessor merely exercises factual control and possesses the requisite intention; the possession must also be continuous, peaceful, and open. Continuous possession is understood as possession that is neither occasional nor temporary in nature. Where possession is lost for a period exceeding six months, the continuity required for acquisitive prescription is interrupted, thereby precluding the acquisition of ownership by prescription. This interpretation has been affirmed in Decision No. 273 of 28 May 2018 in Civil Case No. 3465/2017 of the Supreme Court of Cassation, Second Civil Division.

Where possession is lost for more than six months, acquisitive prescription is interrupted irrespective of the reason for the loss of possession—whether through abandonment of the property, clandestine or forcible dispossession, or even the commission of a criminal offence—unless the former possessor brings a possessory action for the protection of the dispossessed possession within six months. The requirement of continuous possession is closely linked to another essential characteristic, namely the uninterrupted nature of possession. The legal significance of interruption lies in its effect on acquisitive prescription. Under Article 79 of the Bulgarian Property Act, ownership is acquired after five years of good-faith possession and after ten years of bad-faith possession. Article 81 of the Bulgarian Property Act regulates the interruption of possession, which occurs upon the loss of factual control over the property. Once prescription has been interrupted, a new prescriptive period begins to run pursuant to Article 117 of the Bulgarian Obligations and Contracts Act. Consequently, the period that elapsed before the interruption is disregarded and produces no legal effect. The loss of possession for more than six months retrospectively extinguishes the time already accrued for the purposes of

⁴ The additional characteristics of possession have been discussed by many authors. See: Tadjer, V., “Possession”, Part Four, 2001, pp. 29–33; Jerov, Al., Property Law, 2010, p. 72.

acquisitive prescription. This principle has likewise been confirmed in Decision No. 118 of 11 January 2021 in Civil Case No. 665/2020 of the Supreme Court of Cassation, Second Civil Division.

Possession must also be **unequivocal**, in the sense that it should not give rise to doubt as to whether the thing is possessed by another person or whether the possessor lacks the intention to possess it as his or her own. The presumption established by Article 69 of the Bulgarian Property Act provides that a person exercising possession is presumed to possess the property on his or her own behalf unless it is proven that another person exercised possession during the same period. Although doubtful exercise of factual control may arise in practice, this issue is closely related to the requirement that possession be peaceful. By contrast, doubtful intention to possess is conceptually impossible, since intention (*animus*) is a subjective element reflecting the possessor's state of mind and will. Consequently, establishing the existence of the requisite intention is a complex evidentiary process.

Equally important is the requirement that possession be **peaceful** and **open**. Any disturbance or dispossession creates the possibility for another person to acquire factual control over the thing. The requirement of peaceful possession is intrinsically linked to the protection afforded by possessory actions. According to both legal doctrine and the established case law of the Bulgarian Supreme Court of Cassation, possession is regarded as peaceful where it has neither been acquired nor maintained through the use of force. This interpretation is confirmed in Decision No. 216 of 28 October 2016 in Civil Case No. 2182/2016 of the Supreme Court of Cassation, First Civil Division.

Property law confers upon the holder of a real right the authority to exercise direct control over the things. Possession also gives rise to significant legal consequences, including the right to protection through possessory actions, the possibility of acquiring ownership by acquisitive prescription, and the entitlement to compensation for improvements made to the property. Furthermore, the right of ownership encompasses the power to possess as one of its constituent elements.

According to the settled case law of the Supreme Court of Cassation, where possession constitutes an element of acquisitive prescription, it must satisfy a number of cumulative requirements in order to produce its intended legal effect. Specifically, possession must be **peaceful**, meaning that it has neither been acquired nor maintained through the use of force; **open**, in the sense that factual control is exercised in a manner allowing any interested person to become aware of it and that it has not been established clandestinely; **continuous**, meaning that its exercise is not occasional but reflects a lasting intention to hold the property in a manner that excludes the factual control of others; **uninterrupted**, in that it has not been interrupted at all, and in particular not for a period exceeding six months, subject to the presumption established by Article 83 of the Bulgarian Property Act; and **unequivocal**, so that there is no doubt that the possessor holds the property on his or her own behalf.

Although Article 302 of the repealed Property, Ownership and Servitudes Act (ZISS) is no longer in force, the characteristics set out therein continue to be

recognised in both legal scholarship and judicial practice when interpreting Articles 68 et seq. of the Bulgarian Property Act. Taken together, these characteristics embody the interaction between *corpus* and *animus* and serve as the principal criterion for distinguishing possession from detention and from other factual relationships with property. These additional characteristics are a logical consequence of the essential elements of possession. Although they are no longer expressly regulated by statute, they may be inferred through legal reasoning and established principles of legal interpretation. Moreover, some of these characteristics correspond to additional statutory requirements governing the exercise of certain rights, including the distinction between good-faith and bad-faith possession, as well as between lawful and unlawful possession. The additional characteristics of possession also influence its capacity to be transmitted by succession as a factual relationship. In this manner, the law recognises factual control as a heritable factual state, the continuation of which is of legal significance both for preserving possession and for the acquisition of real rights through acquisitive prescription.

2. What Is Inherited?

The inheritance is the aggregate of transferable property rights and obligations held by the deceased at the time of their death. This raises the question of whether possession, as a factual relationship, is capable of being inherited.⁵ Is the possession part of the inheritance? The prevailing view in both Bulgarian legal scholarship and judicial practice is that possession is transmissible by succession as a factual relationship⁶. Nevertheless, some authors⁷ maintain that possession cannot be inherited and that the tacking of successive periods of possession is therefore impossible.

From a historical perspective, the possibility of inheriting possession was expressly recognised in Bulgarian legislation as early as 1890 under the repealed Inheritance Act. Article 184 of that Act provided that "possession of the deceased's property passes to the heir by operation of law, without the need for formal entry into possession." This provision was fully consistent with Article 309(1) of the repealed Property, Ownership and Servitudes Act (ZISS), which likewise provided that

⁵ See Bogdanova, I. "Is Possession Heritable?" *Contemporary Law*, no. 6 (2015), pp. 77–92.

⁶ See Venedikov, P., *New Property Law*, Sofia, 1995, p. 46; Tadzher, V., *Possession*, pp. 116–117; Tasev, Khr., *Bulgarian Inheritance Law*, p. 115; Markov, M., *Family and Inheritance Law*, p. 192; Stavru, S. – In *Discussions...*, p. 218; Petrov, Veselin, *Acceptance of Inheritance*, p. 250; Interpretative Decision No. 4 of 2012 of the General Assembly of the Civil Colleges of the Supreme Court of Cassation.

⁷ Vasilev, L., op. cit., p. 323; likewise Markov, M., *Issues of Inheritance Succession, "Property and Law" Digest*, 2011, Issue 09.

"possession continues by operation of law in the person of the universal heir." By contrast, the current Bulgarian Property Act no longer expressly regulates either the inheritance or the continuation of possession. It contains no provision that clearly and unequivocally requires an heir to continue the possession exercised by the deceased. It is noteworthy that Article 82 of the Property Act merely establishes the possibility of tacking successive periods of possession rather than imposing it as a mandatory rule. The evident purpose of this provision is to facilitate the acquisition of ownership through acquisitive prescription. Its systematic placement within the chapter governing acquisitive prescription confirms this legislative objective.

Accordingly, Article 82 has a limited rather than general scope of application. It is addressed exclusively to possessors in the capacity of predecessors in title and successors in title. Although no transfer or succession of rights occurs in relation to possession itself, the terms "predecessor in title" and "successor in title"—as well as, in the context of succession, "deceased" and "heir"—are employed in a functional rather than a strictly technical legal sense. The tacking of possession pursuant to Article 82 of the Bulgarian Property Act is admissible where there exists a legal succession relationship between the two possessors, namely the former and the current possessor. Such succession may be either **universal succession** or **singular succession**.

In the first hypothesis, namely where universal succession is involved, the possession exercised by the universal predecessor is added to the possession of the universal successor. Where such succession is based on inheritance, the statutory or testamentary heir acquires possession on the date of the opening of the succession, without the need for any act of transfer or delivery of possession.⁸

Singular succession in title arises where the possessor acquires possession from the previous possessor on a legal ground that is capable⁹ of transferring ownership of the property (e.g., sale, donation of the property, or other derivative modes of acquiring ownership). In such a case, in order for the possession of the transferor to be added to (tacked onto) the possession of the singular acquirer, it is necessary not only that a valid title of acquisition exist, but also that acts of delivery of possession be performed.¹⁰

⁸ Decision No. 50033 of 31 July 2023, Civil Case No. 2211/2022, First Civil Division, Supreme Court of Cassation of the Republic of Bulgaria.

⁹ A transfer under a preliminary contract does not fall within this category, since such a contract lacks dispositive character and, as a rule, does not effect the transfer of a right in rem. This position is likewise affirmed in Judgment No. 483 of 6 June 2012, rendered in Civil Case No. 558/2011 by the First Civil Division of the Supreme Court of Cassation: "For the purchaser under a preliminary contract, a new prescriptive period begins to run, and he cannot tack the possession of his transferor onto his own. This is so because Art. 82 of the Property Act permits the tacking of the possession of a transferor, whereas the seller under a preliminary contract is not a transferor, since the contract does not transfer rights in rem but merely constitutes a promise of such transfer in the future."

¹⁰ Decision No. 50033 of 31 July 2023, rendered in Civil Case No. 2211/2022 by the Supreme Court of Cassation, First Civil Division.

3. Distinction Between Transfer and Tacking of Possession

Transfer and tacking of possession constitute distinct legal mechanisms for the acquisition of factual control or rights. The transfer of possession requires an expressly manifested intention and involves the passing of factual control from one person to another. Such transfer takes place between living persons (*inter vivos*). Since the law does not establish specific requirements regarding the form or content of the consent necessary for the delivery of possession, such requirements cannot be introduced through judicial interpretation. Therefore, it should be accepted that the transfer of possession with the consent of the previous possessor may be carried out freely, for example, through the mere delivery of the thing or by means of a written instrument. Possession of a particular object may be transferred from one person to another on the basis of the will and consent of the previous possessor. While the law prescribes formal requirements for agreements aimed at transferring real rights, it does not impose specific requirements concerning the consent required for the delivery and transfer of possession.

In the case of tacking of possession, there is no “delivery” or “transfer” of possession; rather, there is an addition or continuation of the possession exercised by the previous possessor. In order for the legal requirements for the tacking of possession to be fulfilled, it is necessary that the legal effects of the opening and acceptance of the succession have occurred beforehand.

Therefore, in my view, it is not appropriate to refer to an automatic “continuation” of possession. Legal scholarship contains the view that the concept of tacking of possession should be used exclusively in cases of singular succession, whereas in cases of inheritance the term “continuation of possession”¹¹ should be preferred. However, the current wording of Article 82 of the Bulgarian Property Act does not distinguish between the different types of legal succession.

4. Requirements for the Tacking of Possession

The requirements for the tacking of possession under Article 82 of the Bulgarian Property Act consist of the existence of possession, a legal succession relationship between the previous and the current possessor, the exercise of independent possession by the successor, and the homogeneity of the possession. It is necessary that the previous possessor has exercised valid possession, which is subsequently continued by the current possessor, and that a relationship of either universal or singular succession exists between them. Furthermore, possession must not have been interrupted and must relate to the same property. The type of possession is also of essential importance, namely whether it is good-faith or bad-faith

¹¹ Richie, Fr. Possession (from his Theoretical-Practical Guide to Civil Law). Stara Zagora, 1925.

possession, as the legal consequences differ accordingly. It should be assumed that, where possession is tacked from one predecessor in title (or deceased person) to another successor (or heir), the possession must be of the same legal character. In cases of homogeneous possession—for example, where both the predecessor and the successor are good-faith possessors, or where both are bad-faith possessors—the period required for the acquisition of ownership by acquisitive prescription is determined by Article 79 of the Bulgarian Property Act for the relevant type of possession: a total period of ten years in the case of bad-faith possession exercised by both the predecessor and the successor, or a total period of five years in the case of good-faith possession exercised by both. This approach has also been adopted in Decision No. 33 of 20 March 2020 in Civil Case No. 1962/2019 of the Supreme Court of Cassation, First Civil Division.

The invocation of acquisitive prescription by the possessor or his or her heir, which is necessary for the application of prescription due to the prohibition against its application *ex officio* under Article 120 of the Bulgarian Obligations and Contracts Act, applicable to acquisitive prescription by virtue of Article 84 of the Bulgarian Property Act, does not constitute an element of the legal facts giving rise to the acquisition of the real right on this basis. Rather, it represents a procedural means for the protection and recognition of the substantive legal consequences of acquisitive prescription, which are deemed to arise upon the expiration of the statutory period. Accordingly, the possessor acquires the right of ownership pursuant to Article 79 of the Bulgarian Property Act from the moment at which the statutory period of possession expires. This position has also been affirmed in Interpretative Decision No. 2 of 6 November 2025 in Interpretative Case No. 2/2024 of the General Assembly of the Civil and Commercial Chambers of the Supreme Court of Cassation, according to which the heir possesses the procedural right to invoke an acquisitive prescription period that has expired in favour of his or her predecessor in title.

The law does not impose any restrictions regarding the persons entitled to invoke acquisitive prescription, nor does it establish a final time limit within which such invocation must be made. As a procedural means for the protection of the right of ownership, reliance on acquisitive prescription may be exercised by any person claiming rights arising from the expiration of the statutory prescriptive period. This includes both the possessor who has exercised possession for the legally prescribed period and has consequently acquired ownership, as well as his or her successors in title.

Such reliance may be made whenever the need for such procedural protection arises, in particular where a dispute over ownership occurs with a third party, even if this takes place after the death of the possessor who acquired the right of ownership. The prescriptive period does not begin to run in favour of the heir from the moment of the predecessor's death. Rather, the death of the predecessor creates for the heir the legal possibility to tack the possession of the deceased to his or her own possession.

Tacking of possession does not constitute an independent method of acquiring possession; rather, it represents a legal possibility whereby the period of possession

exercised by the predecessor in title is added to the period of possession of the current possessor for the purposes of acquisitive prescription. The exercise of factual control over the property constitutes the first prerequisite for the emergence of the possibility to tack possession. Subsequently, of essential importance is the intention to exercise such dominion over the property with the purpose of continuing the possession of the predecessor in title. This raises the question of whether the property possessed by the predecessor and the property in respect of which tacking is sought must be identical. The two periods of possession must follow one another directly, so that no loss of factual control occurs for an extended period. Furthermore, both periods of possession must remain uninterrupted over time. The possibility of tacking possession may be provisionally divided into two categories: first, with regard to the object of possession, and second, with regard to the subjects involved. In relation to the object of possession, it is necessary to determine which objects may constitute the subject matter of possession. Possession may exist only in respect of individually determined things that are capable of being objects of civil circulation. Generic things, common property, things excluded from civil circulation, property constituting exclusive state ownership, public state and municipal property, as well as things lacking a corporeal character, cannot be subject to possession.

The second question raised concerns the persons who may qualify as possessors. A possessor may be any legally capable person who exercises factual control over a thing with the intention of holding it as his or her own. Possessors may include natural persons, legal persons, the State, and municipalities. For the possibility of tacking possession under Article 82 of the Bulgarian Property Act to arise, a specific prerequisite is also required, namely the existence of a legal succession relationship.¹² An argument supporting this view may be derived from the wording of Article 82 of the Property Act, according to which tacking of possession is possible only where there is a predecessor in title. In cases of tacking possession based on universal succession, the occurrence and acceptance of the relevant legal fact constituting succession must precede the acquisition of such possibility. The death of the predecessor, the opening of the succession, and the acceptance of the inheritance constitute necessary prerequisites for the subsequent occurrence of tacking of possession and, potentially, for reliance on acquisitive prescription.

Furthermore, particular attention should be devoted to two fundamental questions concerning the possibility of inheriting possession. The first question is what occurs where a possessor has exercised possession capable of leading to acquisitive prescription but has died without having invoked the effects of acquisitive prescription. The second question concerns the legal position of property possessed by a person who has died before the prescriptive period required for the acquisition of ownership has expired. Where a possessor who has exercised possession for the purposes of acquisitive prescription dies without having relied upon the acquisitive prescription that has already expired in his or her favour, the question arises whether

¹² Stolfi, N. Possession and Acquisitive Prescription. Stara Zagora, 1928.

ownership of the immovable property may be recognised in favour of his or her heirs. This issue was resolved in point 3 of Interpretative Decision No. 4/2012 of the General Assembly of the Civil Chamber of the Supreme Court of Cassation, adopted in 2014.

According to this interpretative decision, where a person has possessed immovable property for the statutory period provided for in Article 79 of the Bulgarian Property Act but has died before invoking the legal consequences of acquisitive prescription, the estate includes the possession of the property, as well as the possibility for the heirs to rely on the acquisitive prescription period that has expired in favour of the deceased predecessor, provided that they have continued the possession. The reasoning of the interpretative decision further establishes that the effect of the acquisitive title is recognised from the moment when the statutory prescriptive period expires. Therefore, where the heirs invoke acquisitive prescription, it must be considered that the legal basis for acquisition was already completed in the person of the deceased predecessor. Consequently, where the prescriptive period had not expired at the time of the predecessor's death, the heirs may tack the possession of the deceased to their own possession pursuant to Article 82 of the Bulgarian Property Act and complete the remaining part of the statutory period required for the acquisition of ownership by acquisitive prescription.

Where the prescriptive period has already expired at the time of the predecessor's death, the heirs inherit the possibility of relying upon the expired acquisitive prescription. Therefore, in this hypothesis, possession is transmitted by succession, and the heirs may invoke the expired prescriptive period in favour of their predecessor, provided that they have continued exercising possession over the property. This position has also been confirmed in Decision No. 11 of 29 February 2016 in Civil Case No. 3942/2015 of the Supreme Court of Cassation, First Civil Division. The heirs may bring possessory actions, initiate declaratory proceedings, raise an objection based on acquisitive prescription, or request the issuance of a notarial deed establishing ownership on the basis of a verification procedure.

Conclusion

In conclusion, it may be accepted that possession, although it does not constitute a subjective right but rather a factual relationship, is not excluded from succession. The historical development of Bulgarian legislation demonstrates a consistent recognition of the possibility for possession to pass to heirs, despite the fact that the current Bulgarian Property Act does not contain an express regulation concerning the "continuation" of possession. The practical significance of this issue is manifested primarily in relation to acquisitive prescription and the possibility of tacking possession under Article 82 of the Bulgarian Property Act. The examination of the requirements for tacking possession demonstrates that an heir does not automatically acquire the status of a possessor solely by virtue of hereditary succession. It is necessary for the heir to exercise factual control over the property and to possess the intention to hold it as his or her own, namely to fulfil the elements of

corpus and *animus*. For this reason, tacking of possession should not be regarded as an independent method of acquiring possession, but rather as a legal possibility for recognising the period of possession completed by the deceased predecessor for the purposes of acquisitive prescription. The distinction between the transfer, continuation, and tacking of possession is of substantial importance both for legal theory and judicial practice. In cases of singular succession, the delivery of possession is required, whereas in cases of universal succession the legal relationship between the deceased predecessor and the heir arises from the inheritance itself. Nevertheless, in both cases the actual exercise of possession remains necessary.

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