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COMPARATIVE-LEGAL ANALYSIS OF LEGISLATION ON APPEALS OF INDIVIDUALS AND LEGAL ENTITIES IN PROSECUTION BODIES OF FOREIGN COUNTRIES

Zokirov Sherzod Ilxom o'g'li
Academy of the General Prosecution office of the Republic of Uzbekistan, atodavr@gmail.com

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COMPARATIVE-LEGAL ANALYSIS OF LEGISLATION ON APPEALS OF INDIVIDUALS AND LEGAL ENTITIES IN PROSECUTION BODIES OF FOREIGN COUNTRIES

Abstract: The article analyzes the legislation on appeals of individuals and legal entities of advanced developed countries and member states of the Commonwealth of Independent States. In the comparative legal analysis of the legislation of these countries, the place of the prosecutor’s offices in them in the state register is emphasized by dividing them into groups with special attention. This article presents a scientific, theoretical and practical study of the implementation of national legislation on the appeals of individuals and legal entities of the Republic of Uzbekistan on the positive aspects contained in their normative legal acts, in the presentation of the legislation of foreign countries and CIS countries. In this article, it was concluded that it is worth emphasizing the existing positive features in the legislation of foreign countries on the organizational and legal improvement of the sphere of work with appeals of individuals and legal entities in the Prosecutor’s Office of the Republic of Uzbekistan. It is agreed that the bodies of the prosecutor’s office independently of other state bodies are intended to carry out their activities only if they are subject to laws.

Keywords: appeal, developed countries, CIS, state mechanism, normative-legal document, scientific, prosecutor’s office, activities.

INTRODUCTION

The rights of individuals and legal entities to apply are one of the rights enshrined and guaranteed by the Constitution of the Republic of Uzbekistan.

In accordance with Article 118 of the Constitution of the Republic of Uzbekistan and Article 1 of the law “On prosecutor’s office”, it is established that the control over the exact and homogeneous implementation of laws on the territory of the Republic of Uzbekistan shall be exercised by the Prosecutor General of the Republic of Uzbekistan and the prosecutors subordinate to one of the main tasks of the prosecutor’s bodies in the protection of the rights and freedoms of citizens, the full and objective study of the appeals filed by them, the legal solution to appeals is considered.

It should be noted that the Decree of the President of the Republic of Uzbekistan “On measures to radically improve the system of working with appeals of individuals and legal entities” dated December 28, 2016 PD-4904 has launched major reforms in the field of working with appeals in the country.

This Decree is aimed at implementing the principle of “government agencies should serve our people, not people” in the activities of government agencies at all levels, the
introduction of a qualitatively new system of dealing with appeals of individuals and legal entities. The People’s Reception of the President, the People’s Reception of the President and the Virtual Reception of the President were established in the Republic of Karakalpakstan, regions and the city of Tashkent, as well as in each district and city.

A legal entity is any company or organization that has legal rights and responsibilities, including tax filings. It is a business that can enter into contracts either as a vendor or a supplier and can sue or be sued in a court of law.

Legal entities are structured in a way that allows for a greater degree of protection for strictly personal assets from lawsuits and regulatory penalties. Each type of entity provides a different set of protections and tax burdens.

A legal entity can enter into contracts and assume the obligations of those contracts, can borrow and pay debts, can file suits and be named by other parties in suits, and can be held to account for the results of those lawsuits.

What Are the Different Types of Legal Entities?

Legal entities are the various structures under which you may create a corporation: from S corporations and C corporations to limited liability companies, sole proprietorships, trusts, nonprofits and so on.

There are around 15 types of business legal entities in the U.S. that require different variations of legal entity documents. However, the most common legal structures to choose from are:

Sole proprietorship – someone who owns an unincorporated business by himself or herself, making all of the decisions but taking all of the risks.

Partnership – an easy way for business owners to share the responsibilities and profits of a company; typically strengthened by a partnership agreement, making clear the working relationship between the partners from the outset.

C corporation – the most common type of U.S. corporation, establishing a C Corporation offers liability protection meaning the business owners’ assets are not at risk. Yet the downsides include heightened regulatory complexity and increased tax rates.

Limited liability company (LLC) – somewhat of a hybrid between a general partnership and a corporation, LLCs offer the limited liability assurances that corporations offer without the penalty of double taxation. Every legal entity is issued a Legal Entity Identifier (LEI) – a 20-character code that serves as a reference to connect a company with financial information. LEIs are still not fully standardized, despite the globalized economic world in which we live, due to the laws and regulations that govern legal entities fluctuating drastically across jurisdictions.

How Do Legal Entities Differ in Other Countries?

The question “What is the meaning of a legal entity?” varies widely depending on your location. While a legal entity will always be defined the same way – that is, as a company or organization that has legal rights and responsibilities – its ultimate form can differ.

Here’s a whistle-stop global tour of legal entities, beyond the U.S. view:

In the UK, to be an incorporated entity, you can choose a limited company (limited by guarantee or shares), a limited liability partnership (LLP), a community interest company (CIC), a charitable incorporated organization (CIO), an industrial and provident society, or a financial mutual, among others.

In Australia, the four most common types of business structures are a sole trader
(unincorporated), a company, a partnership, and a trust.

In Dubai, which can differ from the other Emirates, companies are registered by category – company, partnership, branch office or free zone company – and are then incorporated as a limited liability company, a civil company, a joint-venture company, a private shareholding company, or a public shareholding company, though this is an extreme simplification of the process there.

In South Africa, the principal methods of doing business are through a public (Ltd), or private (Pty Ltd) company; a personal liability company (Inc); a partnership, business trust, sole proprietorship, or an external company (a branch of a foreign company).

Over in The Netherlands, business is done by a general, limited or professional partnership, a private company with limited liability or as a sole trader.

As you can see, while the meaning of a legal entity doesn’t technically change across different jurisdictions, the legal entity form and types of legal entity can look different and have varying compliance and governance implications.

As a result of large-scale reforms, the law of the Republic of Uzbekistan “On appeals of individuals and legal entities” [1], which regulates relations related to the consideration of appeals of persons in state agencies, including prosecutor’s offices, was adopted in the new edition.

This Law, which came into force on September 11, 2017, contains the basic concepts related to the review of appeals, the basic principles of consideration of appeals, new forms of appeals, the activities of public receptions and virtual receptions, proceedings on appeals, hearing the applicant, termination of the appeal, reflected the new norms on the rights of the applicant, the rights and obligations of the applicant.

On the basis of the information collected through consideration of appeals, legal attitude is expressed to cases that violate the rights and freedoms of individuals and legal entities, fail in the interests of the state and society, and measures are taken to eliminate cases contrary to the legislation.

Analysis of the experience of foreign countries in the full realization of the right to apply, considered the constitutional rights of individuals and legal entities, legislative norms and practice of prosecutor’s control the introduction of the experience of advanced developed countries into national legislation is one of the important tasks today.

In the analysis of the norms established in the normative-legal acts of activity of working with appeals of individuals and legal entities in the prosecutor’s bodies of foreign countries, as well as in the coverage of issues of implementation of specific features of these states into national legislation, it is important to classify the position of prosecutors of foreign countries In the legal literature on this issue, scientists have expressed different opinions. In particular, Z.Ibragimov [2] and O.Toshev [3] studied the classification into 4 groups. That is, the first group includes countries that are part of the Ministry of Justice, the second group includes countries where the prosecutor’s office is completely independent of the judiciary, the third group is countries where the prosecutor’s office is independent and accountable to parliament or the head of state. Similar offices are divided into non-existent groups. Such a classification was also put forward by A.Allamuratov [4] and D.Khamdamova [5].

Scientists can join this classification, which is presented in their research. The reason is that the above-mentioned lawyer scientists have studied the position of the state system of prosecution bodies belonging to different law families. In the
implementation of national legislation, the legal system of these states, the level of legal literacy of the population, the similarity of customs and traditions, the mechanism of state administration, etc., is considered in accordance with the purpose of considering the specific aspects of working with appeals in the prosecutor’s bodies of foreign countries included in these classifications. After all, having studied the experience of developed countries with a hernia, it is appropriate in our opinion to make proposals on the implementation of existing norms into national legislation.

**MATERIALS AND METHODS**

In this research work, attention was paid to the appeals of individuals and legal entities in the countries of the Commonwealth of Independent States. When considering and resolving appeals of individuals and legal entities to the prosecutor’s offices of the CIS and other advanced developed countries, a comparative legal analysis of the legislation of these countries was carried out.

The status of prosecutor’s offices in the listed states is considered. The status of the Prosecutor’s office of the CIS and other advanced developed countries in the state register was studied in groups. In addition, the constitutional significance of the report on the appeals of individuals and legal entities in these States was also mentioned.

In the process of writing the article, such methods as comparative legal, structural, logical, and functional approaches were used, which are considered universal.

**RESULTS – DISCUSSION**

Entering the first model, developed countries such as France, the United States, Germany have their own peculiarities of working with appeals in the prosecution authorities.

In particular, in Frantia, the state prosecutor’s office (Ministire public) enters the system of executive power, acts on behalf of the public and reports directly to the Ministry of Justice. The minister of Justice has the right to inform the prosecutor general about the cases of violation of criminal law, which are known only to him, to consider the issue of criminal prosecution or to order the initiation of a criminal case. In general, the main tasks of the French prosecutor’s office are considered to be related to the implementation of criminal prosecution.

The right to apply to state bodies in France was established by the Constitution of 3 September 1791, which gave citizens the freedom to apply to state bodies as natural and civil rights.

Currently, in the French Republic there are two types of appeals, which are divided into Appeals that are carried out through state bodies and through administrative judicial bodies. At the same time, citizens have the right to claim to the court for the recovery of material damage caused to them after the administrative act (administrative act) or the error of officials.

French legislation does not impose any official requirements for the form of complaint. References are presented in sealed papers and should indicate the actions taken and their harmful consequences for the applicant. The only restriction on the time of filing a complaint is the organization of two months from the date of the implementation of the alleged action [6].

Citizens of the French Republic turn to the leaders of the country directly in the face of problems that are torturing themselves. The most frequent appeals are sent to the president and the Prime Minister of the country.

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the prosecutor general about the cases of violation of criminal law, which are known only to him, to consider the issue of criminal prosecution or to order the initiation of a criminal case. In general, the main tasks of the French prosecutor’s office are considered to be related to the implementation of criminal prosecution.

In France, a lot of work is being done to protect the rights of those who have suffered from crimes in recent years. For example, in the police commissariat, courts and prosecutors, victims are accepted and listened to. In the prosecutor’s office of Paris, a special byuro for victims was established. During the working time of the byuro, citizens can apply there by calling, applying electronically or by going to the byuro. All questions on their appeals will be answered by representatives of byuro and will be considered within the framework of the law [7].

Of course, the protection of the rights of the victim plays a very important role in the prosecutor’s work, the damage caused to the victim according to the results of inspections is assessed and compensation measures are taken.

In France, the law “On the special juvenile justice system for the affairs of minors” was adopted, according to which it was established that an adult who committed an illegal act should be reported to a special prosecutor engaged in the affairs of minors on the fact of detention by the police of an adult. This, in turn, is considered one of the positive aspects in the field of protection of the rights and freedoms of minors in this state.

The right to individual and collective appeals is enshrined in Article 17 of the German constitution, in which it is established that “each person individually or together with others has the right to a written request or complaint to the competent institutions or representative bodies of the people” [8].

In the petitions (proposals), proposals are mainly given to the legislation (on the adoption of new normative legal acts, amendments and additions to the current normative acts or their cancellation). Complaints are usually directed against the actions or omissions of administrative bodies. German citizens also have the right to apply to the Bundestag with a petition. Such petitions are sent to the district of the Bundestag for petitions (the activities of the Bundestag are regulated by Federal legislation).

In the UK or Australia, you could be a sole trader, or in the U.S. a sole proprietorship, and still be able to do business without forming a legal entity. The important distinction is around liability.

Without a legal entity, there is no line between your business finances and liabilities and your personal ones. That means if your company is sued or goes into debt, you could be held personally liable for this; your personal assets could be seized to pay the debt, or you could be sued personally and face the consequences.

It all comes down to what kind of business you’re running. If you’re selling your homemade crafts on Etsy, then you probably don’t need to know the answer to the question, “What is the meaning of a legal entity?”. However, if you’re a startup that’s ready to evolve into your next phase, it’s a good idea to consider which type of business structure best suits your company.

The Chairmen of the Bundestag sends all petitions to the Petitions Committee. If the petition relates to an issue to be discussed in the Standing Committee, the Petitions Committee shall obtain a conclusion from the Standing Committee. There are some exceptions to the petitions Committee’s obligations in reviewing petitions. For
example, petitions related to anonymity, confusing content, or interference in court proceedings will not be considered.

Authorities in accordance with the division printing house, the public authorities of the Federal Republic of Germany also include the prosecution authorities, which are part of the judicial system and are subject to the instructions of the executive authority (Ministry of Justice).

The bodies of the prosecutor’s office are subordinate at the Federal level – the Federal Minister of Justice and the territorial departments of the Ministry of Justice in the localities. In Germany, the prosecutor’s office was established according to the French model in 1818 year and is an organ that must perform the functions of impartial examination of reality and law enforcement [9].

The activities of the prosecutor’s bodies in the Federal Republic of Germany are regulated by the federal law “On the judicial system”, the Criminal-procedural code and the regulations “On the organizational structure of the prosecutor’s bodies” and the internal procedures of the prosecutor’s office [10].

In the Federal Republic of Germany, the Prosecutor’s office also performs the task of coordinating the activities of law enforcement agencies. The scope of powers of the Prosecutor’s Office also includes some civil law issues, in particular, according to the Civil Procedure Code of the Federal Republic of Germany, the prosecutor has the right to file a claim for invalidation of marriage, file a petition for recognition of a person unfit for treatment, apply in accordance with the procedure established by law.

Also, the bodies of the prosecutor’s office have several different options for obtaining information that raises fundamental doubts about the commission of a crime, a suspect, which includes the victim’s application for a committed or planned crime, as well as information from the police.

The general right to appeal violations in the United States is expressed in the First Amendment to the Constitution. Complaints about the actions of officials will be considered by the courts, including the Supreme Court. At the same time, there are departmental inspections by officials and special administrative bodies. This activity is regulated by the 1946 Law “On administrative procedure”, which provides administrative bodies with the opportunity to appeal to the parties regarding transparency, respect for their equality, and decisions taken.

Millions of Americans apply to the president of the United States every year with applications (requests), suggestions and complaints. They will be handled by the Department of correspondence and presidential messages of the White House staff [11].

Americans send written and electronic appeals to the White House. The address of the White House (e-mail address) is addressed to the attention of the population through the media. Appeals are accepted, processed and, if necessary, they are also answered. The correspondence and presidential messaging department has a permanent multi-channel mobile communication tool [12].

According to Article 2 of the US Constitution, the president of the United States appoints the country’s Attorney General (Chief attache) in consultation with the Senate and with his consent to the post. The prosecutor general (he is the minister of Justice) is the legal adviser of the government and the adviser to the president on the policy of combating crimes [13].

In the United States, citizens can apply to the prosecutor’s office only in case of questions related to its competence, if it
turns out that the application is not directly included in the functions and functions of the prosecutor’s office, the application will not be accepted.

Turning to the second model, there are a number of features of working with appeals in the country’s prosecutor’s offices, such as South Korea, Latvia, Spain.

A business entity’s name is highly valuable – it’s what you’re known for in the marketplace, what your reputation is built around, and what you trade from. Yet that doesn’t make it a trademark.

Selecting a name is a hugely important decision, and with this comes responsibility. Legal advice should be sought to ensure that the name is compliant with laws restricting business entity names, and that all steps needed to protect the client’s rights to its name are completed.

An original legal name must be selected before a business entity can be formed. This legal name can be changed in the future, but a business entity can have only one legal name at any given time. Getting it right from the outset can save significant resources and headaches later on.

In particular, the status of the Prosecutor’s office of the Republic of South Korea is defined in the new version of the law “On the Prosecutor’s Office” dated March 14, 2017. In accordance with article 2 of this Law, the enforcement of the rule of law in the country, the investigation of criminal cases, the prosecution of jinos and the support of State charges in the courts are carried out by the Higher Prosecutor’s office, the Higher prosecutors, the offices of district and district prosecutors [14].

The South Korean Prosecutor’s office has its advantages in dealing with appeals. In particular, the state law “On the Prosecutor’s Office” clearly establishes that it is possible to appeal the decisions of the prosecutor’s office to a prosecutor with a high status. In accordance with article 10 of the Law, any applicant dissatisfied with the decision of the relevant prosecutor or the accused in a criminal case may apply in writing to the Prosecutor General of a higher prosecutor’s office, authorized by the district prosecutor’s office or the branch to which the prosecutor is appointed. In such cases, the District Prosecutor’s office or the Prosecutor General of the relevant subdivision shall take measures to satisfy the applicant’s appeal if he considers that the appeal has appropriate grounds.

The prosecutor general of the higher standing prosecutor’s office, if he finds that the filed complaint has a sufficient basis, will instruct him to correct the decision of the lower standing District Prosecutor’s office or branch prosecutor’s office on which the complaint is filed [15].

The activities of the Prosecutor’s office in Latvia are regulated in accordance with the Law “On the Prosecutor’s Office”, adopted on May 19, 1994. In accordance with the law, the bodies of the Prosecutor General’s office of Latvia are a single centralized three-stage system of structural units headed by the Prosecutor general, whose main task is to ensure responsibility for cases of violations of the law and the resolution of the relevant case in accordance with the legislation [16].

If, in accordance with article 16 of the Law “On the Prosecutor’s office”, appeals, reports or information about violations or violations of the law are sent to the prosecutor, the prosecutor conducts an investigation in the following cases in accordance with the procedure established by law. If:

1) if there is information about the crime in the application or in the messages;
2) if the rights and legitimate interests of persons with disabilities, treatment...
disabilities, minors, convicts or other disabled persons who cannot fully protect their rights are violated.

Legal entities don’t manage themselves. Whether you are managing multiple entities or just have one to consider, entity management and entity governance are of utmost importance to your compliance status.

While responsibilities and requirements differ depending on the part of the world in which the legal entity is incorporated, you can guarantee each legal entity will need to submit some form of report to regulators, industry bodies, or government departments on a semi-regular basis – be that annual financial statements, monthly tax filings or confirmation of director information.

Keeping on top of all of your legal entity’s regulatory responsibilities can be both time-consuming and complex, especially once you add into the mix multiple entities within one corporate structure.

Compliance and legal operations teams need to approach managing these entities from an entity governance point of view. This means keeping a strategic eye on all entity requirements and being able to forecast any downstream impact of changes to regulation or responsibilities.

In accordance with part 3 of article 16, the prosecutor also has the right to conduct an investigation into the fact that State bodies violated their rights or legitimate interests, did not eliminate the offenses listed in the application, did not respond to the applicant within the time limits established by law or received a statement of refusal to respond [17].

In the prosecutor’s office of the state of Spain, too, there are positive aspects of working with citizens’ appeals. In particular, in accordance with the law “On the state defender”, adopted on 6 April 1981, the prosecutor general is working in cooperation with the State defender in the consideration of complaints sent by citizens to the prosecutor’s office and in the investigation of crimes [18].

The State defender is given wide powers for the implementation of control over the activities of official bodies of power (he can carry out the control activities on his own initiative or on the basis of the appeal of any citizen), the legislation stipulates that state bodies must provide him with prompt assistance for the conduct of investigations and inspections.

It is appropriate to note that in order to verify the appeals of State bodies about the violation of the fundamental rights of citizens, the Public Defender is granted the right to inspect any official institution or body, including police and prisons, case files or administrative documents related to the consideration and investigation of any information, including documents of a closed nature.

The peculiarity of the prosecutors of the countries falling into the third model of the above classification is their independence, that is, they do not fall into any system and are accountable to the highest authority of the country or the head of state. Examples of such countries are Switzerland, the People’s Republic of China (PRC), a number of developed countries and CIS countries, including the Russian Federation, Georgia, Kazakhstan, Belarus, Kyrgyzstan, etc.

The peculiarity of the prosecutor’s office of the Swiss state is that in articles 7-8 of the Federal law "on the establishment of bodies of criminal proceedings"of this state, the prosecutor’s office is defined as an independent Office [19].

In Switzerland, the Prosecutor’s office exercises only control over the police, and not general supervisory activities. A
An important aspect that we have brought to mind is the expression of particular importance to the appeals of individual entrepreneurs. The implementation of the review of Appeals of individual entrepreneurs and the implementation of control over the implementation of laws on entrepreneurial activity are established by a special law on the prosecutor’s office, which is evidence of the high attention paid to entrepreneurs in the country.

Article 20 of the Law of the Republic of Azerbaijan “On the Prosecutor’s Office” covers the consideration of applications (claims), complaints and appeals, according to which the prosecution authorities, in accordance with the law and within the scope of their powers, consider applications, complaints and appeals, and receive citizens. It is established that applications, complaints and appeals about crimes will be considered without delay [22].

The law of the state of Georgia “On the prosecutor’s office” Chapter 9 is called “the activities of the prosecutor’s office and other issues of its organization”, there is an article 48 of this chapter that regulates the consideration of applications and complaints by the prosecutor’s bodies. It is established that the bodies of the prosecutor’s office should consider the applications and complaints received within the framework of their powers in accordance with the procedure established by the legislation and carry out the reception of citizens, the appeals and complaints about crimes should be considered immediately [23].

Article 21 of the law of the Republic of Kazakhstan “On the prosecutor’s office” is called “consideration of appeals”, according to which it is established that the bodies of the prosecutor’s office, in accordance with the procedure established by law, will consider complaints on violations of the law, actions
(inaction) that violate the rights and freedoms of individuals and legal entities [24].

Part 4 of Article 21 of the Law of the Republic of Kazakhstan “On the Prosecutor’s Office” establishes that “the prosecutor has the right not to disclose information about the applicant in order to protect the interests, rights and freedoms of the applicant”. This is an effective method of early prevention of crimes that may be committed, uncompromising fight against corruption, non-disclosure of the identity of applicants about crimes that are planned to be committed and cases of corruption, protection of their rights and interests.

Article 2 of the Law of the Kyrgyz Republic “On the procedure for considering Citizens’ appeals” establishes principles, including equality of individuals and legal entities (this principle is contained in the Laws of the Republic of Kazakhstan [25] and the Republic of Tajikistan [26] on Appeals), timeliness of consideration of appeals, objectivity and completeness. There is personal responsibility for the performance of duties on appeals, accountability when considering appeals, etc [27].

Article 2 of the Law of the Republic of Tajikistan “On Appeals of individuals and legal entities” also reflects the principles of justice, humanism, and science that are new to our national legislation.

From our point of view, when considering and legally resolving appeals of individuals and legal entities by the prosecutor’s office, the observance of justice, equality of individuals and legal entities and humanitarian principles established in the experience of the legislation of the above-mentioned states corresponds to article 4 of the Law of the Republic of Uzbekistan “On appeals”.

Based on our opinion, we can say that, following the principle of justice or humanity when considering an appeal, the executor of the appeal tries to resolve the appeal in favor of the citizens in a legal way and see all measures of satisfaction.

Justice and humanity in practice. The inclusion of a provision on equality in the legislation means that the status of appeals of all individuals and legal entities is determined by equality before the law and is resolved on the basis of the same requirements set out in the law in relation to the same cases or similar appeals.

In this regard, the German scientist Schmidt stressed that the greatest attention should be paid to the fact that in order to realize the rights of citizens to apply, it is necessary to follow the established printouts on their appeals in the laws. Continue the idea of the scientist, noting that the printips contained in the laws serve as a signal to carry out prematurely, and not to violate or delay established procedures [28].

Proceeding from this, taking advantage of the positive aspects of existing impressions in the legislation of advanced foreign countries, a proposal is put forward to supplement the above-mentioned impressions with Article 4 of the Law of the Republic of Uzbekistan “On appeals of individuals and legal entities”. It should be noted that the reflection of these printouts in our legislation plays an important role in the full realization of the rights to applications, which are considered constitutional rights of individuals and legal entities.

The fourth model can be included among the countries: England, Wales, Scotland, etc. It seems that the different aspect of the states in this classification from the states in another group is that the prosecutor’s office does not exist as a separate institution.

In England, the right to a petition has been preserved in its original form as the right of the population to apply to the higher authorities (the monarch or the Legislative
Assembly) with a proposal to pass (cancel) laws or to make any important state decisions. In the “Bill of rights” of 1689 year, the King was given the right to apply to him by citizens in an unlimited manner, and the arrest and prosecution of such applicants was recognized as illegal [29].

Currently, there is no single regulatory document in the UK regulating the general procedure for citizens’ appeals in connection with the behavior of state bodies, their officials, as well as the protection of human and civil rights and freedoms. The practice of such regulation has historically developed and is determined by legislative acts, judicial precedents, customs and traditions of the Parliament and the Government.

In English law, the right to appeal is not specifically mentioned anywhere, but any person who is dissatisfied with it can appeal to the relevant minister, court or parliament at their discretion.

In England, in order to strengthen the protection of citizens’ rights in Parliament, the post of Parliamentary Commissioner for Special administrative affairs was established. He was given broad powers, similar to judicial powers, to request documents and evidence (including from witnesses).

The Commissioner submits an annual report to Parliament (which will be reviewed by a special committee). Special services have been formed in the UK ministries, which even interact with the parliamentary commissioner. To date, the Ombudsman system in the UK has been supplemented by the introduction of local commissioners.

One of the features of the Institution of Appeals in the UK is that appeals filed by citizens against illegal actions of state bodies and their officials are also carried out through Parliament.

In England and Wales, the prosecutor’s office does not operate. In English courts, most criminal cases are initiated by the police or individuals, only the most serious crimes are dealt with by the main attaché offices [30].

With the law “On criminal prosecution” in 1985 year, the Royal Prosecution Service (Crown Prosecution Service) was established in England and Wales. This service is headed by the director, who is appointed to his post by the General attaché and works under his general leadership. Complaints of citizens about criminal prosecution are considered by this service. In addition, citizens can file a lawsuit with the courts with complaints of criminal prosecution. [31].

In the effective organization of activities to work with appeals of individuals and legal entities, along with the basics established in regulatory legal acts, it is important to improve the organizational and legal basis of these relations, taking into account the experience of foreign countries. Today, the popularity of electronic appeals of individuals and legal entities to every state institution, the fact that their electronic services are becoming an increasingly active consumer, shows that it is important to work with such appeals.

It is worth noting that there are a number of shortcomings in the practice of issuing electronic appeals by individuals and legal entities through the official websites of the prosecutor’s office. As these shortcomings, it is appropriate to say that prosecutors in the system of prosecutor’s offices do not have official websites, including the city of Tashkent, regional and specialized prosecutor’s offices, transport and military prosecutors, do not have their own Internet sites. It should be noted that only the Prosecutor General’s office of the Republic of Uzbekistan, the Department for
combating economic crimes under the Prosecutor General’s office, the Academy of the Prosecutor General’s office and the Bureau of enforcement have their own official websites on the global Internet and daily data entry to these sites, constant addition of information.

Working through electronic applications during quarantine restrictions imposed around the world, including in Uzbekistan in connection with the Covid-19 pandemic, has found its own proof of usefulness for everyone.

We explain our findings on improving the effectiveness of electronic appeals to the prosecutor’s office for a number of reasons:

**Firstly**

Article 11 of the Law of the Republic of Uzbekistan “On the openness of the activities of public authorities and management”, adopted on May 5, 2014, paragraph 1, part 2, defines “posting and updating information on the activities of public authorities and management on their official websites”. And the official website of the Prosecutor General’s office on the Internet, which is considered the highest instance of the system of prosecutor’s offices, does not fully comply with this requirement of the law. That is, there are no official data in the field of appeals, statistics are updated irregularly, work with electronic appeals of individuals and legal entities is also not fully reflected on the site;

**Secondly**

It is impossible to provide (attach) documents, photos and other media information that will fully disclose the content of your appeal by calling the short number 1007 of the existing call center in the Prosecutor General’s office;

**Thirdly**

If you want to send an electronic application on the official website of the Prosecutor General’s office on the Internet, the website is integrated into the website of the virtual reception of the President, and you can follow the link “pm.gov.uz” you will be asked to submit an application via the website. This leads to excessive consumption of resources. Therefore, it is worth optimizing the official website of the Prosecutor General’s office and organizing the official websites of regional prosecutors, as well as making electronic appeals through them in a convenient way for citizens of any age.

For each person using an electronic application, it is desirable to have an official website of the state body to which he applies. Only the fact that the Prosecutor General’s office has its own page on the Internet can cause problems, as noted above, in the full realization of the rights of individuals and legal entities to submit applications electronically. Taking this into account, we suggest that for the convenience of individuals and legal entities, each regional prosecutor’s office has its own official websites.

We have witnessed how important it is to work with electronic appeals in the activities of the prosecutor’s office by conducting a survey among citizens on social networks. That is, in the questionnaire, almost half (40.9 percent) of those who answered the question about what methods it is desirable to improve the work of electronic appeals in the prosecutor’s office noted that
each regional prosecutor’s office should have its own official website on the global Internet. 25 percent of respondents noted that it is necessary to submit a request via social networks.

It can be seen that at present, when information and communication technologies are rapidly developing, it is necessary to organize work for individuals and legal entities with the full realization of the rights enshrined in the Constitution to apply for them, using all possibilities.

The prosecutors of the regional prosecutor’s offices, who are considered middle-level prosecutors are obliged to pay further attention to the appeals of individuals and legal entities, to make independent decisions with a full sense of responsibility.

In this regard, the President of the Republic of Uzbekistan Sh.M.Mirziyoyev also sent an Appeal to the Oliy Majlis of the Republuc of Uzbekistan on December 29, 2020 “… decision-making in the activities of departments is excessively centralized. There are cases of repetition of each other in their activities when their functions are not clearly and completely defined. .. The fact that middle-level leaders cannot take the initiative to resolve the issue” [34]. Also proves that middle-level leaders are burdened with great responsibilities and responsibilities.

In order to improve the work of the Prosecutor’s office with electronic appeals, the official website of the Supreme court of the Republic of Uzbekistan on the Internet was studied. According to the results of the study, we have witnessed a number of positive cases. That is, if representatives of individuals or legal entities want to apply to the Supreme court through their official website on the Internet, about 500 samples of lawsuits, petitions and statements on civil and economic cases, as well as complaints in Uzbek, Russian and Karakalpak languages are posted [35]. This, in turn, provides the following relaxation for everyone:
- free use of the application form for relevant disputes for applicants to the court and the list of documents that must be attached to this dispute;
- saving time and money that applicants have to pay a lawyer in this case;
- improving the culture and literacy of the population when applying to the court.

For comparison, when we look at the experience of foreign countries, we can see that in the prosecutor’s offices of the Republic of Kazakhstan a number of convenience is created in the electronic application of citizens to the prosecutor’s offices.

That is, the Republic of Kazakhstan is divided into administrative units in the form of 14 regions and 3 republican cities. In all these administrative units there are prosecutor’s offices, these bodies have their official websites on their separate Internet pages. The purpose of this project is to provide citizens with information about the criminogenic situation in the territory, new statistical information, to familiarize citizens with the dates of reception of the leadership of each city and regional prosecutor’s office, to create opportunities for electronic appeals to the prosecutor’s office through each official website. Similar experience can also be found in countries such as the Russian Federation [36], Belarus [37], Latvia [38], Ukraine [39].

In our opinion, thanks to the introduction of this practice, the following positive changes have occurred in the life of the state and society:
- thanks to the appeals of individuals and legal entities to the activities of all state bodies, the formation of a new work culture is achieved, saving time and energy of employees;
- increases labor productivity and ensures the stability of resources in the field of working with links;
- this serves to ensure that the norms established in the normative legal acts adopted in the country on the appeals of individuals and legal entities are practically observed and implemented through various platforms.

CONCLUSIONS

According to the above analysis, it is envisaged that the third model States will participate in the organization of the activities of the prosecutor’s bodies and in the majority of the laws regulating its activities, in the work of the prosecutor’s bodies and prosecutors with citizens’ appeals, as well as in the implementation of control over the implementation of laws Russian scientist P.A.Belyakov can agree with the views that” the rules on appeals of citizens are considered an independent type of activity established at the legislative level of the prosecutor’s bodies of the countries falling into the third model category” [32]. After all, the consideration and resolution of Appeals of individuals and legal entities in special laws of the prosecutor’s bodies, which are considered independent according to their place in the system of state bodies, is of particular importance in separate articles.

In conclusion, it can be noted that the activities of the Prosecutor’s office of the Republic of Uzbekistan, analyzing the experience of foreign countries, working with the appeals of modern individuals and legal entities, as well as monitoring the implementation of laws in this area, are similar to the legislation of a number of countries.

Although some of the experience of foreign countries belonging to each of the above groups is reflected in the legal system of our country, there are also aspects that can be implemented. When introducing positive experience into national legislation, it is necessary to take into account a number of criteria, in particular the form of government of the country, the main tasks and functions assigned by law to the prosecutor’s office, the rights and freedoms of citizens, including their appeals, and take into account similar and different aspects of their solution.

From the above, it is possible to draw the following conclusions again. In almost all countries of Europe and the United States, the prosecution authorities are the body responsible for upholding the charge in court and carrying out criminal prosecution. This is connected with the developed judicial system, which provides for effective protection of the violated rights of citizens (if it does not include the commission of a crime) in criminal cases and without the intervention of the prosecutor’s office.

For a long time, along with prosecutors in European countries, effective parliamentary control is being carried out in this area of legal relations. There is an Ombudsman Institute for Human Rights, which carries out control over almost all spheres of social life, including the protection of Labor Relations and the electoral rights of citizens, environmental issues and even the activities of bodies of Investigation and public order.

The prosecutor’s office and other similar bodies, performing similar functions with the functions of the prosecutor’s bodies, are participating in the consideration of appeals in all modern countries of the world, which have different degrees in different forms, criminal prosecution, support of public accusation, civil, arbitration proceedings.

But in all identified States, only the bodies of the prosecutor’s office exercise control over the implementation and observance of laws regulating the right of citizens to apply to the state and local
authorities. This is of particular importance in the Prevention of cases of violation of the law, in the protection of the rights of individuals and legal entities.

In turn, cases of violations of citizens’ rights in our country are still high. The opinion of the President of the Republic of Uzbekistan Sh. Mirziyoyev in his speech at the tantanali ceremony dedicated to the 27th anniversary of the adoption of the Constitution of the Republic of Uzbekistan confirms that more than 510 thousand appeals received by the people’s reception were resolved positively, suggests that prosecutors face many tasks [33].

The high level of attitude of all bodies to the appeals of citizens contributes to the development of the country. Appeals play an important role in knowing and eliminating painful points in the country.
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