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BRIEF ANALYSIS

of the current political and legal situation in the Kyrgyz Republic

"Dualism of Executive Power: President or Cabinet of Ministers?"

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**Kyrgyz Republic, Bishkek city
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INTRODUCTION

This document is intended for a wide range of stakeholders and is the second part (continuation) of the political and legal analysis of the current situation in the Kyrgyz Republic (KR) and its most important events.

The political and legal analysis covers the current situation related to **the transition to a presidential form of government and the formation of executive power, in particular, the Cabinet of Ministers of the Kyrgyz Republic, in terms of compliance with the Constitution of the Kyrgyz Republic.**

The Legal Community “Tandem” hopes that the presented analytical work will help decision-makers, as well as experts, lawyers, representatives of civil society in their professional activities and will assist in making informed and thoughtful decisions.

Part I. The process of constitutional reform for the transition to a presidential form of government and the current situation for its implementation

As is known, on January 10, 2021, along with the presidential elections in the Kyrgyz Republic, a constitutional referendum was held, where 40% of voters took part. The country's voters had to make a choice:

- For the Presidential form of government;
- For the Parliamentary form of government;
- against both options.

As a result, 84% of the voters who took part voted for the presidential form of government. It should be noted that before that the Kyrgyz Republic was considered a parliamentary-presidential republic.

On November 17, 2020, the first draft of the Constitution with 61 amendments was proposed, then on November 20, 2020, by decree of the Acting President of the Kyrgyz Republic, a constitutional meeting was created, which again began to prepare a new draft Constitution in the direction of establishing a presidential form of government. After the inauguration of the President of the Kyrgyz Republic, the constitutional reform initiated by the country's parliament and the activities of the constitutional meeting took a more accelerated pace. The Law of the Kyrgyz Republic of March 12, 2021 No. 31 "On the appointment of a referendum (nationwide vote) on the draft Law of the Kyrgyz Republic" On the Constitution of the Kyrgyz Republic "was prepared and adopted.

On April 11, 2021, a referendum was held, where more than 37% of voters took part. As a result, more than 79% of the voters who took part voted for the new draft Constitution.

On May 5, 2021, the Law of the Kyrgyz Republic No. 59 "On the Constitution of the Kyrgyz Republic" (hereinafter referred to as the Law on the Constitution), adopted at a referendum, entered into force. According to article 8 of the "transitional provision" of the Law on the Constitution, the Jogorku Kenesh of the Kyrgyz Republic and the Cabinet of Ministers of the Kyrgyz Republic, within six months, must take the necessary measures arising from the Constitution, including bringing existing laws and their decisions in line with the Constitution of the Kyrgyz Republic.

Furthermore, in accordance with Art. 4 "transitional provisions" of the law on the Constitution, prior to the formation of the composition of the Cabinet in accordance with the new Constitution, Presidential Decree No. 114 dated 05.05.2021, the Cabinet of Ministers of the Kyrgyz Republic was temporarily formed, which will be finally formed after the adoption of the Constitutional Law "On the Cabinet of Ministers".

Thus, the voters of the Kyrgyz Republic have chosen the presidential form of government, and therefore, it is imperative that the voters' will be realized.

To implement the concept of a presidential form of government, it is necessary to take into account:

- Constitutional laws and other laws must be adopted in accordance with the current Constitution of the Kyrgyz Republic;
- Appropriate mechanisms, systems and management structures of the presidential form of government should be formed.

According to world practice regarding the presidential form of government, *the President solely forms the executive power and is also responsible for its result. The balance of the branches of government is ensured through the approval of the budget by the Parliament, which provides a "system of checks and balances".* Of course, such a "theoretical" model of government may have its own characteristics in different countries.

The legal basis for the presidential form of government in the Constitution of the Kyrgyz Republic is laid down in the following norms:

"The President is the head of state, the highest official and heads the executive power of the Kyrgyz Republic" (clause 1, article 66).

"The executive power in the Kyrgyz Republic is exercised by the President" (clause 1 of article 89).

"The President, on the basis of the constitutional law, manages the activities of the executive power, gives instructions to the Cabinet of Ministers and its subordinate bodies, controls the implementation of his orders, repeals acts of the Cabinet of Ministers and subordinate bodies, temporarily removes members of the Cabinet of Ministers from office" (Clause 3, Article 89)

"The President bears personal responsibility for the results of the activities of the Cabinet of Ministers and the executive power" (clause 5 of article 89).

Thus:

- The President of the Kyrgyz Republic is the head of the executive power and can form the Cabinet of Ministers.

- In the constitution of the Kyrgyz Republic, the legal status of the Cabinet of Ministers is not defined, it is not clear that the Cabinet of Ministers acts independently or is "under" the President.

However, a legal analysis of the current situation in the Kyrgyz Republic and legislative initiatives shows that a number of legal issues and dilemmas arise in the implementation of the presidential form of government.

For example, the current institutions of the executive power and their powers do not fully comply with constitutional norms:

- The legal status of the Cabinet of Ministers and the Chairman of the Cabinet of Ministers has not yet been determined. At the same time, the institutions of the Chairman of the Cabinet of Ministers and the Head of the Presidential Administration of the Kyrgyz Republic function, while there is no clear delineation of powers between them. The current political and legal situation is characterized by the dualism of the executive power. Currently there are: the President (nominally the head of the executive branch) and the Chairman of the Cabinet of Ministers (who, as before, is associated with the head of the executive branch and continues to perform essentially “prime ministerial” functions).

- **Bills initiated by the executive branch are not supported by the head of the executive branch - the President.** Uncoordinated work is underway to initiate bills between the President and the Cabinet of Ministers, there were facts about the rejection of the Cabinet of Ministers' initiatives by the President. For example, he opposed the initiative of the Ministry of Economy and Finance of the Kyrgyz Republic, according to which the powers of local internal affairs bodies in identifying and suppressing violations in the economic sphere were expanded. The President was also against the initiative of the Ministry of Education and Science of the Kyrgyz Republic regarding a fixed collection of money from the parents of students.
- **The current composition of the Cabinet of Ministers is temporary** in accordance with Article 4 of the Law "On the Constitution of the Kyrgyz Republic" dated May 5, 2021 No. 59. The President, on the basis of Decree No. 114 dated May 5, 2021, temporarily formed the composition of the Cabinet and appointed the heads of other executive bodies.

In accordance with Art. 8 of the Law "On the Constitution of the Kyrgyz Republic" dated May 5, 2021 No. 59, the Jogorku Kenesh and the Cabinet of Ministers were instructed to take the necessary measures arising from the Constitution within six months, including bringing existing laws and their decisions in line with it. In order to implement this provision, the Cabinet of Ministers took a simple path, deciding to amend the current laws and regulations governing the activities of the executive power, by simply replacing the word "Government" in the texts of the regulations with "Cabinet of Ministers",

which is categorically unacceptable due to the transformation of the form of government in the Kyrgyz Republic.

In part, such proposals of the Cabinet of Ministers appear to be based on the lack of clarity in the Constitution regarding the status of the Cabinet of Ministers, as well as on the absence of a clear concept on the formation and implementation of executive power.

Part II. Conceptual issues requiring clarification / resolution in relation to the executive power

For the effective functioning of the executive power in the Kyrgyz Republic, it is necessary to have a clear conceptual vision on the following points/issues. At the same time, the answers to these questions should be determined before the adoption of normative legal acts regulating the status of persons exercising executive power. **The legislative initiatives of the interim Cabinet of Ministers on the adoption of new laws and amendments to existing laws are very hasty, since the Constitutional Law "On the Cabinet of Ministers of the Kyrgyz Republic", as well as the draft Law "On regulatory legal acts of the Kyrgyz Republic" have not yet been adopted.**

2.1. The status of the head of the executive branch:

The President is the head of the executive branch. The institution of the Cabinet of Ministers (including its chapter) is introduced in accordance with Chapter 3 of the Constitution. Therefore, **it is advisable to follow the thesis that the executive power in the Kyrgyz Republic is exercised by the Cabinet of Ministers headed by the President.**

For the implementation of the above, it is necessary to adopt the relevant regulations, including the Constitutional Law "On the Cabinet of Ministers". It should be borne in mind that if the current legislation of the executive power is adopted as a basis, then a simple "replacement" of the powers of the Prime Minister with the powers of the Chairman of the Cabinet of Ministers cannot be justified due to the difference in their constitutional status. ***In the current situation, the head of the Cabinet of Ministers cannot have the rights that the Prime Minister previously had.***

The legal status for the exercise of the powers of the head of state until the election of a new President, in the event of early termination of his powers by the President, is assigned to the Toraga of the Jogorku Kenesh, and only if he is unable to exercise such powers, this right is exercised by the **Chairman of the Cabinet of Ministers (paragraph 2 of article 74 of the Constitution)**. ***The chairman of the Cabinet of Ministers is not the head of the executive branch.***

An important issue will be in the field of foreign policy and the representation of the head of state and the head of the executive branch - the "government" in foreign relations. ***As is known, in a number of international organizations in which the Kyrgyz Republic participates, there are bodies such as the Council of Heads of State and the Council of Heads of Government (for example, the CIS, SCO, etc.).*** Despite the existing precedents (participation of the

Chairman of the Cabinet of Ministers U. Maripov in the UMPS meeting on August 19-20, 2021 in Cholpon-Ata). *It is necessary to define conceptually who will represent the executive branch in this area.*

2.2. Formation of the executive power:

"The structure and composition of the Cabinet of Ministers is determined by the President" (paragraph 2 of Article 89 of the Constitution), and the Jogorku Kenesh of the Kyrgyz Republic "agrees to the appointment of the Chairman of the Cabinet of Ministers, his deputies and members of the Cabinet of Ministers" (paragraph 6 of paragraph 1 of Article 80 of the Constitution). *It is necessary to clarify the procedure for "giving consent" by the Jogorku Kenesh regarding the structure and composition of the Cabinet: will it be a formality or a mechanism that allows parliament to influence the President's decisions, as well as determine the possibilities for the President to overcome the opinion or opposition of the parliament. It should be noted that a clear definition of the mechanism will be essential to prevent future political crises.*

It is necessary to resolve the issue regarding the powers of the head of the executive branch - the President to appoint the heads of other executive bodies that are not part of the structure of the Cabinet of Ministers. In addition, the President is empowered to appoint and dismiss heads of local state administrations. It seems important in this context to determine the legal status of this institution. Previously, it was called the Plenipotentiary Representative of the Government in the region, and now it has been renamed into the Plenipotentiary Representative of the President, so far without changing the functionality.

2.3. Organization of activities of the executive branch of government and the procedure for making decisions:

The main issue concerning the organization of the activities of the Cabinet of Ministers is the issue of holding its meetings: the frequency of meetings and the "efficiency" of the executive branch, as well as the procedure for making decisions.

The issue of organizing the activities of the Cabinet of Ministers is entrusted to the Chairman of the Cabinet (clause 2 of article 90 of the Constitution), at the same time "the President presides over the meetings of the Cabinet of Ministers" (clause 4 of article 89 of the Constitution). *It is necessary to organize work in such a way that the performance of the functions of the head of the executive branch does not interfere with the functioning of the President as head of state.*

As a rule, decisions of the executive power in foreign countries are made in the form of resolutions and orders, the same practice is used today in the Kyrgyz Republic. But questions arise regarding the procedure for making and signing decisions that must be signed by the President, as the head of the executive branch. Its decisions are formalized in the form of decrees and orders. *The President presides over the meetings of the Cabinet of Ministers (clause 4 of Article 89 of the Constitution), which implies the approval of the decisions of the Cabinet by the President. However, clause 3 of Article 89 of the Constitution stipulates*

that the President “cancels the acts of the Cabinet of Ministers and subordinate bodies”, which implies the possibility of making decisions by the Cabinet independently. At the same time, when exercising this authority, a conflict arises: if the President presides over the meetings of the Cabinet of Ministers, then how can he cancel the decisions taken at such meetings? It is necessary to consider mechanisms of decision-making in the Constitutional Law “On the Cabinet of Ministers”. In order to avoid collisions and increase the efficiency of the head of state, it seems expedient for the President of the Kyrgyz Republic to "delegate" to the Chairman of the Cabinet of Ministers powers to sign decisions taken at meetings of the Cabinet chaired by the President.

It is also important to determine the question **of the relationship between the President of the Kyrgyz Republic and the Chairman of the Cabinet of Ministers and the delimitation of their powers in the sphere of executive power.**

In this area, the Constitution of the Kyrgyz Republic enshrined the following norms: The President determines the structure and composition of the Cabinet, appoints (with the consent of the JK of the KR) the Chairman of the Cabinet, accepts petitions for the resignation of the Chairman of the Cabinet and the decision on his resignation. And the Chairman of the Cabinet of Ministers organizes the activities of the Cabinet of Ministers and is responsible to the President for the activities of the Cabinet of Ministers (paragraph 2, clause 2, article 90 of the Constitution). Thus, the Chairman of the Cabinet of Ministers must "organize the activities of the Cabinet" and bear responsibility before the head of state for the activities of the Cabinet of Ministers. At the same time, the Chairman of the Cabinet of Ministers is the head of the Presidential Administration (paragraph 2, clause 2, article 89 of the Constitution) - the body that ensures the activities of the President of the Kyrgyz Republic.

2.4. Relationship between the President and the Chairman of the Cabinet of Ministers with the Jogorku Kenesh of the Kyrgyz Republic

It is necessary to clearly define the following:

- who (the President or the Chairman of the Cabinet of Ministers) will represent the executive power before the parliament;
- how the right of legislative initiative will be implemented by the President and the Chairman of the Cabinet of Ministers (Article 85 of the Constitution) on the activities of the executive power.

In theory, a situation is possible when a law initiated by the Cabinet of Ministers and then adopted by the Jogorku Kenesh of the Kyrgyz Republic will not be signed by the President of the Kyrgyz Republic and returned **to the Jogorku Kenesh with objections.** In this case, in accordance with clause 3. Art. 87 of the Constitution, **the Jogorku Kenesh of the Kyrgyz Republic can overcome the "veto" by voting with a qualified majority for the previously adopted version of the bill initiated by the Cabinet of Ministers.** In this connection, it is assumed that **the draft constitutional law "On the Cabinet of Ministers" should contain a norm on the approval of the bills initiated by the Cabinet of Ministers with the President of the Kyrgyz Republic before sending it to the Jogorku Kenesh of the Kyrgyz Republic for consideration.** The same collision may arise if the President and the Chairman of the

Cabinet of Ministers determine the bill submitted to the Jogorku Kenesh of the Kyrgyz Republic as urgent if the second body (the President or the Chairman of the Cabinet of Ministers) has an opposite opinion. *These mechanisms are important for securing responsibility for legislative initiatives of the Cabinet of Ministers to the President, as to the head of the executive branch.*

2.5. Executive responsibility/accountability

Who is accountable to the people of the Kyrgyz Republic for the results of the activities of the executive branch? In fact, this is the role of the President, but it is heavily veiled. The Chairman of the Cabinet of Ministers is responsible for the activities of the executive branch before the President, although his role is programmatic and organizational. The Jogorku Kenesh of the Kyrgyz Republic will not be able to demand a report on the results of the activities of the executive body, since it is simply informed by the President. This means that it is necessary to clearly resolve these issues in the Constitutional Law “On the Cabinet of Ministers”.

The President is personally responsible for the results of the activities of the Cabinet of Ministers and the executive power (clause 5, article 89 of the Constitution). At the same time, “to whom” the President is responsible is not defined. The President “annually submits to the Jogorku Kenesh of the Kyrgyz Republic information on his activities” (clause 3 of article 70 of the Constitution), but it is not specified in what form this information can be presented. Theoretically, it can be sent in writing without being present at the meeting of the Jogorku Kenesh of the Kyrgyz Republic and providing information in the form of a report with subsequent questions and answers.

The only form of parliamentary control over the Cabinet of Ministers is the hearing by the Jogorku Kenesh of the Kyrgyz Republic of the annual report on the execution of the republican budget. “If the Jogorku Kenesh of the Kyrgyz Republic recognizes the report on the execution of the republican budget as unsatisfactory, the responsibility of the members of the Cabinet of Ministers is considered by the President” (clause 6 of article 89 of the Constitution).

At the same time, "the Chairman of the Cabinet of Ministers is responsible to the President for the activities of the Cabinet of Ministers" (paragraph 2, clause 2 of article 90 of the Constitution), and also controls the implementation of his instructions, temporarily removes members of the Cabinet of Ministers from office (clause 3 of article 89). It is necessary to prescribe a form of "control" on the part of the President over the activities of the Cabinet of Ministers/Chairman of the Cabinet of Ministers, as well as its grounds and frequency of reporting (Cabinet or Presidential Administration).

2.6. Issues of development of regulatory legal acts and amendments to existing regulatory legal acts

The process of bringing the laws of the Kyrgyz Republic in line with the adopted Constitution of the Kyrgyz Republic of May 5, 2021 will require not only the adoption of the Constitutional Law "On the Cabinet of Ministers", but also the introduction of amendments to other regulatory

legal acts of the Kyrgyz Republic, which previously regulated the powers of the Government of the Kyrgyz Republic. Since February 2021, the process of inventorying the legislation of the Kyrgyz Republic has been underway, within the framework of which the laws of the Kyrgyz Republic are being brought into line with the Constitution.

Of course, the issue in each specific case must be resolved depending on the context and specific authority, but at the same time, it is necessary to conceptually determine the unacceptability of a simple technical replacement of the words: "Government" by "Cabinet of Ministers" and "Prime Minister" by "Chairman of Cabinet of Ministers ", since the status of these bodies does not coincide, and in some cases, the introduction of the President of the Kyrgyz Republic instead of the Prime Minister as the head of the executive branch will be required.

For example, when developing new laws and regulations, when making changes to existing laws, it is advisable to use the term "executive authority", and not the Cabinet of Ministers, if the term "Government of the Kyrgyz Republic" was previously used, since in accordance with the Constitution of the Kyrgyz Republic, independent and separate executive authority as before.

In this connection, it is important to first decide on the concept itself, conduct a thorough analysis of the current regulatory legal acts, and then proceed to the development and approval of the Constitutional Law "On the Cabinet of Ministers".

Thus, the Constitutional Law "On the Cabinet of Ministers" should contain answers to the above-mentioned conceptual questions and fix:

- **the status of the President as the head of the executive branch;**
- **a clear procedure for the formation of the Cabinet of Ministers by the President and the participation of parliament in this process;**
- **organizing the activities of the executive branch of government, meetings of the Cabinet of Ministers and the presidency of the President at meetings;**
- **relationship between the President of the Kyrgyz Republic and the Chairman of the Cabinet of Ministers and the delineation of their powers in the area of executive power;**
- **issues of “combining” by the Chairman of the Cabinet of Ministers powers of the Chief of Staff of the Presidential Administration of the Kyrgyz Republic;**
- **who will represent the executive before parliament;**
- **the form and frequency of "control" by the President over the activities of the Cabinet of Ministers / Chairman of the Cabinet;**
- **the impossibility of a simple technical replacement in the current regulatory legal acts of the words “Government” for “Cabinet of Ministers” and “Prime Minister” for “Chairman of the Cabinet of Ministers”, as well as the need for a thorough conceptual study.**

Part III. Disadvantages of the draft constitutional law "On the Cabinet of Ministers of the Kyrgyz Republic"

At the end of July 2021, the Jogorku Kenesh of the Kyrgyz Republic considered the draft Constitutional Law "On the Cabinet of Ministers of the Kyrgyz Republic", initiated by the President of the Kyrgyz Republic. During the consideration by the deputies of the Jogorku Kenesh of the Kyrgyz Republic, criticism was expressed in relation to the draft law, and it was also noted that it was advisable to revise it. Nevertheless, on July 29, 2021, the Jogorku Kenesh of the Kyrgyz Republic adopted the specified bill in the first reading.

The analysis of this draft indicates significant shortcomings of the draft document. Without going into a detailed article-by-article analysis of the bill, it is necessary to pay attention to the following main points.

So, **firstly**, some norms of the draft constitutional law do not correspond to the Constitution of the Kyrgyz Republic. For example, *Article 2 of the draft states that "The Cabinet of Ministers of the Kyrgyz Republic is the highest executive body subordinate and accountable to the President of the Kyrgyz Republic", such a norm contradicts Articles 66, 89 of the Constitution of the Kyrgyz Republic.*

Giving the Cabinet of Ministers the status of "supreme executive body" does not comply with the Constitution of the Kyrgyz Republic, since only the President of the Kyrgyz Republic is endowed with such a status, which in general corresponds to the concept of a presidential form of government. Or another example, according to paragraph 4 of article 89 of the Constitution of the Kyrgyz Republic "The President presides over the meetings of the Cabinet of Ministers." While the draft law, this right of the President is limited only to extraordinary meetings of the Cabinet: the draft proposes that *"Meetings of the Cabinet of Ministers are convened by the Chairman of the Cabinet of Ministers and held under his chairmanship. The agenda of a meeting of the Cabinet of Ministers is determined by the Chairman of the Cabinet of Ministers", and the President "has the right to convene extraordinary meetings of the Cabinet of Ministers, determine the agenda and preside over its meetings. "* Thus, the President of the Kyrgyz Republic will not be able to participate and chair the regular meetings of the Cabinet of Ministers.

Secondly, it seems that when preparing the draft law, it is possible that the current Constitutional Law "On the Government of the Kyrgyz Republic" was taken as a basis. The developers, probably, took the path of excluding the norms concerning the formation of the Government by the parliament, and replacing the term "Government" with "Cabinet of Ministers" in the text of the document. Thus, practically all the powers of the Government are retained in the draft law, while in view of the changes in the form of government and, consequently, the status of the Cabinet of Ministers under the new Constitution, there should be conceptual changes in terms of the powers of the Cabinet and its head. For example, the draft law (by replacing the word "Prime Minister" with "Chairman of the Cabinet of Ministers") proposes that "the Chairman of the Cabinet of Ministers is the highest official of the executive

branch" (clause 1 of article 18), while according to clause .3 Article 89 of the Kyrgyz Republic The President "on the basis of the constitutional law directs the activities of the executive power".

Thirdly, the draft constitutional law contains provisions that expand the powers of the Cabinet of Ministers, and, accordingly, carry risks of upsetting the balance between the branches of government and abuse by the Cabinet of Ministers of its powers. For example, Article 28 is supposed to consolidate the right of the Chairman, his deputies or members of the Cabinet of Ministers to be present at a meeting of the Supreme Court of the Kyrgyz Republic (which creates a collision, since sessions of the Supreme Court can be held in a specific judicial process, in connection with which it is necessary to specify this norm). It is also proposed to consolidate such rights in terms of participation in meetings and collegia of the Prosecutor General's Office, and meetings of the Accounts Chamber. It is also proposed to include norms that the Supreme Court, the Prosecutor General, the Accounts Chamber, the National Bank of the Kyrgyz Republic, the Central Commission for Elections and Referendums of the Kyrgyz Republic and Akyikatchy of the Kyrgyz Republic "have the right to apply to the Cabinet of Ministers with a proposal to initiate draft laws and other regulatory legal acts in the manner determined by the Rules of Procedure of the Cabinet of Ministers "(Articles 28-33). The adoption of such norms, which provide for the appeal of constitutional bodies to the Cabinet of Ministers, and not to the President of the Kyrgyz Republic, can greatly weaken the principle of separation of powers and, in fact, makes these bodies dependent on the Cabinet of Ministers, and not on the President of the Kyrgyz Republic.

Fourth, the draft law does not comply with the rule-making technique defined in the Law of the Kyrgyz Republic "On Regulatory Legal Acts of the Kyrgyz Republic" dated July 20, 2009 No. 241, including the design of paragraphs, numbering, there are internally inconsistent proposals, etc.

Fifth, it is unclear whether it is expedient to endow members of the Cabinet of Ministers, heads of other executive authorities, deputy ministers and chairmen of state committees with a special legal status, establish exemptions from criminal legislation, as well as provide them with social guarantees, compulsory medical insurance, etc.

Sixth, the procedure for adopting a law is in violation of the requirements of the law on holding a public discussion procedure, which is becoming traditional in the process of adopting laws. Despite the fact that the draft Constitutional Law is posted on the website of the President of the Kyrgyz Republic, the developer has not taken measures to organize a broad public discussion, conduct round tables, etc.

CONCLUSIONS AND VISION FOR FUTURE STEPS

- 1. It is necessary to develop a clear and precise conceptual framework for the transition to a presidential form of government that meets the requirements of the Constitution of the Kyrgyz Republic, thereby laying the foundation for the development of institutions of government bodies and the implementation of the goals and objectives of state policy.**
- 2. Development of the Constitutional Law "On the Cabinet of Ministers of the Kyrgyz Republic" in accordance with it in strict accordance with the Constitution of the Kyrgyz Republic.**
- 3. Until the adoption of the Constitutional Law "On the Cabinet of Ministers of the Kyrgyz Republic", the approval of the composition and structure of the Cabinet in accordance with this law, as well as the adoption of the new law "On Normative Legal Acts", it is proposed not to amend the current laws of the Kyrgyz Republic regulating the activities of the executive body.**

Sincerely,

Legal Community "TANDEM" represented by:

- Ergeshbaeva Tattuububu, Coordinator of the Community
- Tokoev Toktobek, Head of the Analytical Department of the Community
- as well as members of the Community.