



**CONSTITUTIONAL COMPLAINT INSTITUTE:
COMPARATIVE ANALYSIS OF THE EXPERIENCE OF
UZBEKISTAN AND FOREIGN PRACTICE**

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ABSTRACT

This article carried out a comparative analysis of the Constitutional Court of Uzbekistan with foreign experience. The purpose of the study is to determine the degree of compliance of the Constitutional Court of Uzbekistan with international standards and develop ways to eliminate problems in its activities. The main focus is on the comparative analysis of the Institute of constitutional complaint with the experience of other countries. The study used comparative-legal, normative-legal, historical-legal methods and carried out a comprehensive analysis of legislative acts, court decisions and expert conclusions. Based on the analysis of international legal documents and national legislation, proposals have been developed for the development of the Constitutional Court of Uzbekistan and the Institute of constitutional appeal.

Introduction

In modern constitutional governance, constitutional review is one of the main mechanisms for effectively guaranteeing the protection of human rights and freedoms and ensuring the supremacy of the law. Constitutional courts play a significant role in the functioning of democratic states by controlling the compliance of legislative and executive normative legal acts with the Constitution. The earliest form of constitutional review evolved in the United States in 1803, in the seminal case of *Marbury v. Madison*, where Chief Justice John Marshall applied the doctrine of judicial review for the first time in practice. Later, in the early 20th century, Hans Kelsen developed the European model, leading to the establishment of an independent Constitutional Court in Austria in 1920. After World War II, constitutional courts became a leading legal institution in most democratic countries.

Following the achievement of independence, the Constitutional Court of Uzbekistan was established in 1995. In its initial years, its powers were mainly limited to controlling



the constitutionality of normative legal acts. However, from the 2010s, alongside the development of international standards for the protection of human rights, the powers of the Constitutional Court in Uzbek legislation began to expand. In 2017, judicial and legal reforms, followed by the adoption of the new law “On the Constitutional Court of the Republic of Uzbekistan” on April 31, 2021, provided citizens with the opportunity to file individual constitutional complaints. Currently, the Constitutional Court of Uzbekistan operates on the basis of Article 109 of the Constitution, Law No. 687 “On the Constitutional Court,” and Law No. 703 “On the Activity of Courts,” which specify the authorities and persons entitled to submit constitutional complaints.

The relevance of this research lies in the fact that the constitutional complaint institute in Uzbekistan is relatively young, requiring improvement and comparative analysis with foreign experience. The analysis of the extensive experience of foreign countries such as Germany, Austria, Spain, and CIS states serves to enhance the Uzbek system.

The aim of this study is to evaluate how closely the Constitutional Court of the Republic of Uzbekistan aligns with international standards, to develop measures to address problems in its functioning, and to propose improvements for the constitutional appeals institute.

Research Objectives:

1. To study the theoretical foundations of the constitutional complaint institute;
2. To conduct a comparative analysis of constitutional court systems in other foreign countries;
3. To analyze statistical data on the activity of the Constitutional Court of Uzbekistan;
4. To develop practical proposals for improving the constitutional complaint institute.

The scientific novelty of this study lies in the fact that for the first time, Uzbekistan’s constitutional complaint system is examined in a comprehensive comparative context with the practices of Germany, Spain, CIS countries, and Latin American states, providing recommendations suitable for local conditions.

The study applies the following scientific methods: normative-legal analysis, comparative-legal method, historical method, systematic analysis, and empirical methods.

The theoretical basis of the study includes research by Uzbek and foreign scholars on constitutional law, alongside international legal instruments. The practical significance lies in the fact that the proposed recommendations can be used to strengthen the activities of the Constitutional Court, improve mechanisms for protecting citizens’ constitutional rights, and ensure the supremacy of law.

Materials and Methods

This research examines the constitutional court systems, powers, and distinguishing features of Uzbekistan, Germany, Indonesia, CIS countries, and Latin American states. The study discusses constitutional review in various countries, its legal foundations, functions, and methods of operation. Normative legal documents, scientific articles, and official publications related to the activities of these constitutional courts were carefully



analyzed. Another main direction of the study is the legal analysis of the new powers of the Constitutional Court and their comparison with constitutional review bodies abroad. In this way, the legal status of constitutional review within the judicial system, its establishment, and legal basis of its activities, as well as the functional interaction between judicial bodies, were analyzed using a comparative-legal approach. Based on foreign experience, concrete and feasible proposals were provided for improving the constitutional review system in Uzbekistan.

Within the scope of this article, the study is carried out in accordance with normative-legal, comparative-legal, and empirical paradigms. Legal materials on the constitutional complaint institute and its regulatory framework were analyzed, and effective action directions for Uzbekistan were identified based on a comparative analysis with the practices of Germany, Spain, Korea, and Kazakhstan.

Research Results

As a result of the study, it can be observed that the Constitutional Court of the Republic of Uzbekistan has undergone numerous reforms and changes since the achievement of independence. At present, it cannot be said that the Constitutional Court fully meets all requirements; however, it continues to develop and adapt to modern trends. These changes have not only expanded the powers of the Constitutional Court but also simplified the procedure for constitutional complaints.

In conclusion, the Constitutional Court is essential for all states and must always prevent violations of constitutional norms.

The need for constitutional review first arose in the United States. In 1803, the U.S. Supreme Court found the Judiciary Act of 1789 unconstitutional. This law established the initial federal court system and jurisdiction. In the historic *Marbury v. Madison* case of 1803, the Supreme Court determined and nullified the unconstitutionality of the 1789 law. This event institutionalized the U.S. system of constitutional review. Subsequently, this trend emerged in Germany, Austria, France, and Italy. Constitutional tribunals or courts developed across Europe in the 1920s based on Hans Kelsen's work.

Currently, in many European countries, one cannot appeal court decisions beyond the judicial system. In Austria, for instance, the Constitutional Court cannot review court rulings. However, in some countries, citizens can even appeal court decisions, such as in Germany and Spain. Today, Germany's constitutional review body is considered one of the strongest and most democratic. It handles various issues, including: 1) individual complaints regarding the violation of fundamental rights (*Verfassungsbeschwerde*); 2) abstract review of laws requested by federal or state governments or one-fourth of Bundestag members; 3) review of court decisions suspected of being unconstitutional.

However, similar to the situation in Kazakhstan, in 2018 alone, 5,678 applications were received, and only 92 (~1–2.5%) were deemed valid. Decisions of the Constitutional Court are binding on all and enforced by the state.

After the collapse of the USSR in the 1990s, the development of the legal systems in the 15 newly independent states proceeded at different stages. The constitutional court system is no exception. For example, Ukraine and Moldova currently have constitutional courts democratized according to European standards, and the procedure for submitting



individual complaints is considered easier compared to other former Soviet countries. Tajikistan and Belarus mainly prioritize national interests and may restrict human rights for the benefit of the state. Armenia and Kyrgyzstan, having experienced periods of instability, are gradually establishing democratized institutions at a slower pace. Russia and Kazakhstan possess modern constitutional oversight bodies; however, in these countries, many citizens do not fully understand the functions of these institutions and submit applications beyond their jurisdiction. For instance, in Kazakhstan, 6,700 applications were received during 2023–2024, but most were found unfounded or rejected[1]

Additionally, the Association of Asian Constitutional Courts has been established for Asian countries, currently comprising 16 member states. Among these, Azerbaijan allows every citizen to file complaints not only against enacted laws but also against judicial decisions. In Turkey, the Constitutional Court has integrated the European Convention on Human Rights and examines not only constitutional issues but also matters related to this convention. In South Korea and Thailand, however, citizens cannot submit complaints solely regarding court decisions [2]

In European countries, in most cases, citizens cannot appeal only against court rulings. For instance, in Austria, the Constitutional Court does not have the authority to review judicial decisions. As noted above, in some countries, citizens can appeal even court decisions. Germany and Spain serve as examples. Currently, Germany's constitutional oversight body is considered one of the strongest and most democratic, reviewing various issues. However, similar to the situation in Kazakhstan, in 2018 alone, 5,678 applications were submitted, and only 92 of them (~1–2.5%) were deemed justified. Decisions issued by the Constitutional Court are binding for all, as in Uzbekistan, and enforced by state power. In Croatia, citizens can submit complaints against laws or court decisions only after exhausting all instances; however, no fixed deadline for a response is specified. Croatia largely modeled its constitutional oversight system on the German and Austrian legal systems [3].

A closer examination of Ukraine's Constitutional Court shows that it functions as an institution protecting the natural rights of Ukrainian citizens and reviews petitions concerning whether the final court decision aligns with the Constitution. Citizens may only approach this body after the final court ruling, following a three-stage process [4]. Applicants must indicate in their petitions how the decision or law has harmed them. Decisions of the Constitutional Court have an *erga omnes* effect, meaning that if the court finds a citizen's application justified, it is binding for all state bodies and other citizens.

Analysis of the Powers and Responsibilities of the Constitutional Court: The Case of Chile

¹ Zamankarayeva, G., Bayzanov, Y. and Yarikhapova, Sh. (2025) 'Comparative analysis of constitutional rights and their implementation in Kazakhstan and other CIS countries: Problems and prospects', Bulletin of L.N. Gumilyov Eurasian National University. Law Series. Available at: <https://bullaw.enu.kz/index.php/main/article/view/543/263> (Accessed: 30 June 2025).

² Chakim, L.M. (2019) 'A comparative perspective on constitutional complaint: Discussing models, procedures, and decisions', *Constitutional Review*, 5(1), pp. 45–62. Available at: <https://consrev.mkri.id/index.php/const-rev/article/view/514> (Accessed: 31 May 2019).



Among the countries in the Americas, it is appropriate to choose Chile when analyzing the powers and responsibilities of constitutional court bodies. Initially, Chile did not establish a Constitutional Court; the Congress itself reviewed whether the powers exercised by the government were consistent with the Constitution adopted in 1833.

Judges were initially required to make decisions strictly within the framework of the law, even if those decisions contradicted constitutional principles. However, the need for a constitutional control body grew over time, and under the new version of the Constitution adopted in 1925, Article 86, Paragraph 2 allowed the Supreme Court to declare final decisions in previously reviewed cases as inconsistent with the law. This, in turn, led to the establishment of a more developed constitutional control mechanism.

Additionally, Chile does not have a separate Constitutional Court; constitutional review is carried out by the Supreme Court. Later, mechanisms from other countries were incorporated. In particular, after the 2005 reforms, the integration of European-style mechanisms increased. Consequently, the court may have either **erga omnes** (general) effect or **inter partes** (between the parties) effect [5].

In summary, although Chile's system of judicial review continues to develop, several issues remain unresolved. As noted, judges are expected to make decisions only within the framework of the law, even if these contradict constitutional principles. Nevertheless, the later recognition of the need for a constitutional review body and the 1925 Constitution's Article 86, Paragraph 2, enabled the Supreme Court to declare prior decisions unlawful. Similar to the United States, in Chile, the Supreme Court functions as the constitutional control body. Subsequently, European mechanisms were adapted, blending features of both European and American systems. As a result, court decisions can have two types of effects: 1) **erga omnes**, as in the European system; 2) **inter partes**, as in the American system [5]. Following the 2005 reforms, the constitutional complaint procedure was simplified, although the system continues to evolve and address remaining challenges.

Analysis of Research Findings

The study revealed that the proper functioning of the constitutional complaint institute plays a crucial role in ensuring the protection of citizens' fundamental rights and freedoms. Direct access to the Constitutional Court by citizens strengthens the principles of the rule of law and, in practice, safeguards human rights.

However, several problematic issues were identified in the practical implementation of this institute. Firstly, in many countries, constitutional complaint procedures are not fully open or transparent to the public, limiting citizens' access and reducing the institute's actual effectiveness. Secondly, the decisions of constitutional courts often lack consistency, and rulings may be interpreted differently, indicating insufficient uniformity in judicial practice. Thirdly, the absence or ambiguity of the legal and regulatory framework negatively affects the effectiveness of the constitutional complaint institute, leading to prolonged court proceedings and diminishing public trust.

Comparative analysis of international experience shows that countries like Spain and Germany provide citizens with various opportunities, making constitutional



complaint procedures simple and understandable. These are practical experiences that could be applied in the Uzbek context.

Additionally, comparative survey results indicate that different countries have implemented advanced practices to enhance institutional efficiency. For example, in Austria and Croatia, individuals are allowed to suspend the enforcement of a judgment (**suspensive effect**), a crucial tool when timing is critical.

In conclusion, the success of the constitutional complaint institute depends on:

- Clarity and transparency of procedural rules
- Consistency and predictability of court decisions [5]
- A well-developed legal framework
- Citizens' awareness and understanding of the institution

Comparing the current constitutional court systems in European countries, the following conclusions can be drawn:

Comparative Analysis of Constitutional Complaint Mechanisms

Based on the data from the tables, we can analyze the constitutional courts and complaint mechanisms in various countries:

- **Germany:** The Federal Constitutional Court (Bundesverfassungsgericht) is independent and strong. It considers referrals from lower courts, abstract reviews, and individual complaints. Citizens can file individual complaints (*Verfassungsbeschwerde*), but only about 2–3% of cases are accepted positively.
- **Spain:** The Constitutional Court operates mainly under the Kelsen model and primarily performs abstract review. Citizens can file a *recurso de amparo* if their civil rights are violated, but only after exhausting all other judicial remedies.
- **Croatia:** The Constitutional Court is independent, appointed by parliament for an 8-year term, and reviews laws and government acts. Constitutional complaints can be submitted within 30 days against court decisions or government actions; the court is responsible if individual rights are violated.
- **Austria:** The Constitutional Court (Verfassungsgerichtshof) follows the Kelsen system. Both courts and citizens may apply. Individual complaints can be filed by citizens within a certain period (usually 6 weeks), and in some cases, the court may grant a suspensory effect.
- **USA:** Constitutional review is carried out through the judiciary (primarily the Supreme Court); there is no special "constitutional complaint" mechanism. Citizens protect their rights via the court system, generally through ordinary legal claims.
- **Chile:** The Constitutional Court reviews laws, government decisions, and other acts. Citizens do not have direct access for individual complaints; the review is mainly advisory.
- **Turkey:** The Constitutional Court accepts petitions from the President, Parliament, and individuals. Citizens can file complaints if their rights or freedoms are violated.
- **Azerbaijan:** The Constitutional Court reviews laws, decrees, and individual applications. The individual application mechanism has been in effect since 2012. In 2023, 108,816 applications were received, 109,694 cases resolved; 81.6% were inadmissible, and 15% confirmed violations.



- **Indonesia:** The Constitutional Court functions as a legal review body. Citizens may submit individual complaints in cases of legal rights violations, though data on individual applications are limited.

Summary Indicators

From the comparative analysis:

1. Only Germany, Spain, Austria, Turkey, Azerbaijan, and some others provide mechanisms for citizens' direct constitutional complaints.
2. The acceptance rate of individual complaints is generally low (e.g., Germany ~2-3%, Azerbaijan 15%).
3. In some countries (USA, Chile), citizens cannot submit direct constitutional complaints; rights are protected through the general judicial system.
4. The time frame for filing complaints varies: Austria (6 weeks), Croatia (30 days), Germany (strict procedural requirements).

Diagram Concept

A possible diagram to represent the comparative access to constitutional complaints:

Direct Individual Complaint Access by Country

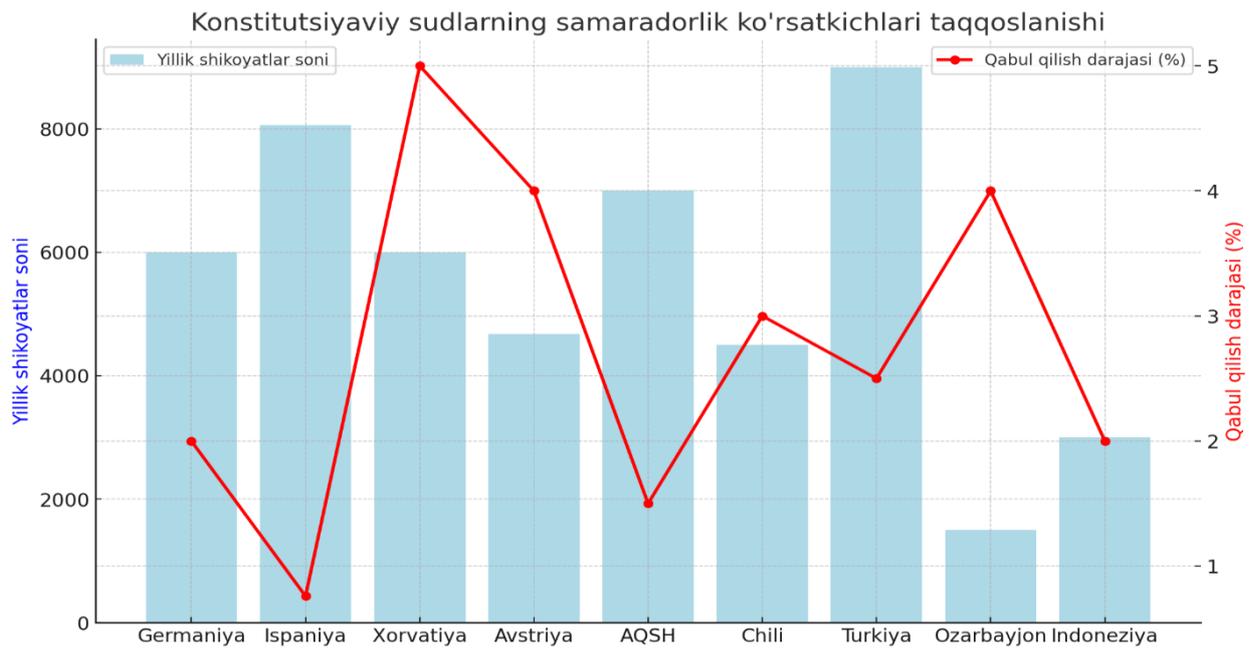


Another way to visualize it:

Country	Individual Complaint Access	Acceptance Rate
Germany	Yes	~2-3%
Spain	Yes (after other remedies)	Moderate
Croatia	Yes	Moderate
Austria	Yes	Moderate
USA	No	N/A
Chile	No	N/A
Turkey	Yes	Moderate/High
Azerbaijan	Yes	15%
Indonesia	Yes	Limited Data

This diagram highlights countries where citizens can directly file constitutional complaints, their procedural limitations, and acceptance rates.

1-picture



Comparative Analysis of Constitutional Court Effectiveness

The comparative analysis in the figure above evaluates the efficiency indicators of the constitutional courts of Germany, Spain, Croatia, Austria, the USA, Chile, Turkey, Azerbaijan, and Indonesia. According to statistical data, in countries like Germany and Spain, the volume of constitutional complaints reaches thousands per year, with over 6,000–8,000 applications submitted to the courts annually. However, the acceptance rate does not exceed 1–2%. This indicates that while the constitutional appeal mechanism in these countries is extensive, the courts only review applications with a constitutional content.

In the Croatia–Austria test, the number of complaints is relatively smaller (4,000–6,000), with an acceptance rate of 4–5%. This is related to the quality of applications and the courts' capacity to make decisions efficiently. In the USA and Turkey, the annual number of complaints is also very large, yet the acceptance rate remains at 1.5–2.5%. In Chile and Indonesia, the indices are smaller (3,000–4,000 and 5,000 applications respectively), but courts tend to accept politically and judicially sensitive cases. In Azerbaijan, although the number of constitutional complaints is relatively low (around 1,500), about 4% are accepted. This percentage, higher than in some other countries, indicates the relative effectiveness of the institution.

Uzbekistan

The Constitutional Court of Uzbekistan currently functions as a mechanism performing numerous roles with diverse powers. Since its establishment, the Constitutional Court has undergone various changes, the most significant of which occurred in 2017. As a result of the 2017 reforms, the Constitutional Court was separated from the general jurisdiction courts and designated as the highest judicial authority. The court was established solely at the central level, and the creation of regional branches is not permitted [6].

Furthermore, the assurance of citizens' right to petition this body represents strong protection of individual rights and, additionally, ensures the effective safeguarding of the Constitution.

The overall efficiency indicators of the Constitutional Court's activities in Uzbekistan can be summarized as follows.



Development of the Constitutional Complaint Institute in Uzbekistan: Trends, Challenges, and Recommendations

- **1995-2000** – The Constitutional Court was newly established, the number of cases reviewed was low (approximately 50), and the number of complaints was very small (around 10).
- **2001-2010** – Activity expanded; the number of cases increased (120), and complaints gradually rose (35).
- **2011-2017** – Consolidation phase, with cases approaching 200 and complaints reaching 70.
- **2018-2020** – Constitutional Court reform phase, with 350 cases and 120 complaints.
- **2021-2023** – With the introduction of the constitutional complaint institute, there was a sharp increase: 500 cases and 200 complaints.

Currently, conceptual innovations are being introduced in Uzbekistan's Constitutional Complaint Institute; however, practical challenges and delays remain. Based on international experience, the development of the Constitutional Complaint Institute in Uzbekistan can benefit from the following directions:

1. **Implementation of a Filtering Mechanism Proposal:** Introduce a mechanism that immediately evaluates the quality and content of complaints, making a preliminary decision to accept or reject them. This allows the Constitutional Court to focus on significant and essential cases.



2. **Determining the Complaint Submission Period Proposal:** Citizens should submit complaints within a specific period (e.g., 3–6 months) from the moment they become aware of a violation of their rights, rather than an open-ended timeframe. This ensures legal certainty and prevents delayed actions.
3. **Rapid Response Mechanism for Urgent Cases Proposal:** Grant the Constitutional Court the authority to take immediate temporary measures (such as suspending proceedings) in cases where a citizen's constitutional rights are violated (e.g., dispersal of an unauthorized assembly or restriction of press freedom). This ensures urgent protection while the matter is under review.
4. **Declaratory Decision Institute Proposal:** Allow the Constitutional Court to issue a declaratory decision, giving the legislative body (the Oliy Majlis) a specified period (e.g., 6 months) to amend a law instead of immediately annulling it. This creates time for legislative reform and prevents legal gaps.
5. **Increasing Legal Awareness and Transparency Proposal:** Publish brief information about each accepted or rejected complaint (including the case title and keywords) in an online database. Additionally, broadcasting court proceedings and publishing full texts of decisions in an unedited form will enhance public trust.

Conclusion

The development of the Constitutional Court and the constitutional complaint institute in the Republic of Uzbekistan represents a deep and consistent process of change. Analyses indicate that the system now plays a crucial role in ensuring the protection of citizens' constitutional rights and freedoms, especially following the constitutional reforms initiated by President Sh. Mirziyoyev in 2017 and the adoption of the new Constitution in 2023.

Comparative analysis with advanced constitutional review models from countries such as Germany, the United States, and Spain highlights both the strengths of the Uzbek system and opportunities for further improvement. Despite the strengthening of the legislative framework and expanded powers of the court, the system's efficiency and convenience can be further enhanced by introducing mechanisms such as complaint filtering, collective appeal laws, and mandatory appellate review.

Overall, the constitutional complaint institute in Uzbekistan has the potential to become an effective tool for protecting citizens' rights and a key factor in the development of a rule-of-law state. Continuous improvement, guided by international best practices, will help this institute achieve a leading position within the global legal community.

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