



ҚҰҚЫҚ ҚОРҒАУ ЖӘНЕ БАСҚА МЕМЛЕКЕТТІК ОРГАНДАР ҚЫЗМЕТІ / ДЕЯТЕЛЬНОСТЬ ПРАВООХРАНИТЕЛЬНЫХ И ИНЫХ ГОСУДАРСТВЕННЫХ ОРГАНОВ / THE ACTIVITIES OF LAW ENFORCEMENT AND OTHER GOVERNMENT AGENCIES

UDC 347.963; 343.2/.7(4/9)
IRSTI 10.71.35; 10.71.91

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ELECTRONIC DOCUMENT MANAGEMENT IN THE PROSECUTOR'S OFFICE: PRACTICE OF THE KYRGYZ REPUBLIC AND FOREIGN EXPERIENCE (COMPARATIVE ASPECT)

Abstract. The article examines the introduction of electronic document management in the prosecutor's offices of the Kyrgyz Republic and provides a comparative analysis of foreign experience (Kazakhstan, Uzbekistan, Republic of Korea, Russia, China). The main achievements and problems of digitalization of prosecutorial bodies are noted. Particular attention is paid to how Kyrgyzstan uses the experience of Kazakhstan in this field. It has been revealed that the implementation of automated records management systems and a unified electronic register significantly increase the efficiency of supervisory activities, reduces the time for consideration of materials, and increases the transparency of prosecutorial supervision. Foreign experience (including the use of the information-analytical system "Qadaǵalau" in Kazakhstan, total digitalization of records management in the Republic of Korea, and experiments with AI-prosecutors in China) demonstrates the prospects for further digital transformation of the prosecutor's office.

Keywords: electronic document management; prosecutor's office; digitalization; automated system; electronic register; supervisory activity; comparative analysis; foreign experience.

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ПРОКУРАТУРА ОРГАНДАРЫНДАҒЫ ЭЛЕКТРОНДЫҚ ҚҰЖАТ АЙНАЛЫМЫ: ҚЫРҒЫЗ РЕСПУБЛИКАСЫНЫҢ ТӘЖІРИБЕСІ ЖӘНЕ ШЕТЕЛДІК ҮЛГІЛЕР (САЛЫСТЫРМАЛЫ АСПЕКТ)

Аннотация. Мақала Қырғыз Республикасының прокуратура органдарында электрондық құжат айналымын енгізу қарастырылып, шетелдік тәжірибеге (Қазақстан, Өзбекстан, Корея Республикасы, Ресей, Қытай) салыстырмалы талдау жасалады. Прокуратура органдарын цифрландырудың негізгі жетістіктері мен мәселелері атап өтіледі. Бұл салада Қырғызстанның Қазақстан тәжірибесін қалай пайдаланатынына ерекше назар аударылған. Іс жүргізуді автоматтандырылған жүйелерді және бірыңғай электрондық тізілімді енгізу қадағалау қызметінің тиімділігін едәуір арттыратыны, материалдарды қарау мерзімін қысқартатыны және прокурорлық қадағалаудың ашықтығын жоғарылататыны анықталды. Шетелдік тәжірибе (оның ішінде Қазақстандағы «Қадағалау» ақпараттық-талдамалық жүйесін қолдану, Корея Республикасында іс жүргізуді толық цифрландыру және Қытайдағы жасанды интеллект-прокурорларымен тәжірибелер) прокуратураның бұдан әрі цифрлық трансформациясының болашағын көрсетеді.

Түйінді сөздер: электрондық құжат айналымы; прокуратура; цифрландыру; автоматтандырылған жүйе; электрондық тізілім; қадағалау қызметі; салыстырмалы талдау; шетелдік тәжірибе.



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ЭЛЕКТРОННЫЙ ДОКУМЕНТООБОРОТ В ПРОКУРАТУРЕ: ПРАКТИКА КЫРГЫЗСКОЙ РЕСПУБЛИКИ И ЗАРУБЕЖНЫЙ ОПЫТ (СРАВНИТЕЛЬНЫЙ АСПЕКТ)

Аннотация. В статье рассматривается внедрение электронного документооборота в органах прокуратуры Кыргызской Республики и проводится сравнительный анализ зарубежного опыта (Казахстан, Узбекистан, Республика Корея, Россия, Китай). Отмечены основные достижения и проблемы цифровизации прокурорских органов. Особое внимание уделено тому, как Кыргызстан использует опыт Казахстана в этой сфере. Выявлено, что внедрение автоматизированных систем делопроизводства и единого электронного реестра значительно повышает эффективность надзорной деятельности, сокращает сроки рассмотрения материалов и повышает прозрачность прокурорского надзора. Зарубежный опыт (в т.ч. использование информационно-аналитической системы «Қадағалау» в Казахстане, тотальная цифровизация делопроизводства в Республике Корея и эксперименты с ИИ-прокурорами в Китае) демонстрирует перспективы дальнейшей цифровой трансформации прокуратуры.

Ключевые слова: электронный документооборот; прокуратура; цифровизация; автоматизированная система; электронный реестр; надзорная деятельность; сравнительный анализ; зарубежный опыт.

DOI: 10.52425/25187252_2025_37_183

Introduction. Digital transformation affects all areas of state activity, including the prosecutorial system. In modern conditions, the effective functioning of prosecutor's offices is unthinkable without the introduction of information and communication technologies and the automation of accounting and supervision processes. As Gruzdev V.V. et al. note, despite the complexity of the digitalization process of prosecutor's offices, the use of automated programs, electronic document management, and the capabilities of artificial intelligence increases the speed, quality, and accuracy of prosecutors' work, bringing law enforcement activities to a new level. The goal of digital innovations is to achieve more effective enforcement of legality and law and order while minimizing bureaucratic barriers [1].

In Kyrgyzstan, the transition of the prosecutor's office to electronic document management has been actively implemented in recent years. Since December 1, 2021, simultaneously with the entry into force of new criminal and other codes, the General Prosecutor's Office has put into operation the automated information systems "Unified Register of Crimes" and "Unified Register of Offenses" throughout the country. These centralized electronic databases allow the registration of reports on crimes and misconduct exclusively in digital format. At the same

time, an updated version of the departmental electronic document management system of the prosecutor's offices of the Kyrgyz Republic was launched, covering all prosecutorial bodies. In fact, since November 2021, all document management in the prosecutor's office has been transferred to electronic form, and the first entry in the new Unified Register of Crimes was made at 00:56 on December 1, 2021 (the Chuy Regional Department of Internal Affairs registered a traffic accident) [2].

In many countries, strategic documents aimed at the digital transformation of prosecutor's offices have been adopted. For example, in the Russian Federation, the Concept for the Digital Transformation of the Bodies and Organizations of the Prosecutor's Office until 2025 is being implemented, approved by the order of the Prosecutor General of the Russian Federation and updated in accordance with modern requirements. Similar programmatic measures are also being taken in the countries of Central Asia. Thus, the Security Council of the Kyrgyz Republic approved the concept "Digital Kyrgyzstan 2019–2023," aimed at widespread digitalization, including the sphere of law and order. In Uzbekistan, the President approved by Decree the Strategy "Digital Uzbekistan – 2030," initiating the broad introduction of ICT into public



administration and the work of law enforcement agencies. According to researchers, the processes of digitalization of prosecutor's offices in the CIS countries generally follow global trends and are aimed at increasing the efficiency of supervisory activities.

Materials and methods. The study has a review-comparative character. Methods of comparative legal analysis, generalization of experience, and content analysis of documents were used. The materials included: current regulatory legal acts of the Kyrgyz Republic and foreign countries on digitalization issues (2020-2025), official data and press releases of the prosecutor's offices, as well as scientific publications from departmental collections and peer-reviewed journals. For Kazakhstan, Uzbekistan, the Republic of Korea, the Russian Federation, and the People's Republic of China, sources in Russian were considered, including data from the Coordinating Council of Prosecutors General of the CIS, materials of news agencies, and scientific works. The reliability of the conclusions is ensured by reliance on specific facts and figures (for example, the results of system implementation, regulations, statistics), and not only on theoretical assumptions. Such a methodological approach makes it possible to objectively compare the practice of Kyrgyzstan with foreign experience and to determine the prospects for the further development of electronic document management in the prosecutor's offices.

Results, discussion. In the Kyrgyz Republic, the digitalization of prosecutor's offices is carried out in the context of the overall state policy "Digital Kyrgyzstan". The starting impetus was the adoption of conceptual documents: in 2019, the Security Council of the Kyrgyz Republic approved the Concept of Digital Transformation "Digital Kyrgyzstan 2019-2023," which defined the transition to electronic interaction in all state bodies. In the development of these ideas, the basic law was reformed. The Constitutional Law of the Kyrgyz Republic "The Prosecutor's Office of the Kyrgyz Republic" (signed on September 10, 2021) was adopted, which reflects new requirements for the organization of the activities

of the prosecutor's office, including the need to introduce modern technologies and information systems into the work of the prosecutorial bodies. The law established the legal foundations for maintaining the Unified Register of Crimes and Offenses, electronic registration of appeals, and other digital innovations [3].

One of the key achievements of digitalization was the creation of the system Unified Register of Crimes and Offenses (URCO) – a centralized electronic database for the registration of all criminal cases and offenses. Since January 1, 2019, this automated information system has been functioning nationwide. Its implementation made it possible to transfer into electronic format the process of registration, monitoring, and supervisory control over the investigation of crimes. As a result, the efficiency of accounting increased: according to official data of the Prosecutor General's Office, in the first 8 months of 2020, more than 90,000 pre-trial proceedings were registered in the URCO. Prosecutors obtained the ability to track the progress of investigations online, which improves the quality of supervision and the discipline of investigative bodies. In addition, the electronic register minimizes the risks of loss or concealment of case materials and ensures uniformity of crime statistics [3, 178 p.].

In December 2021, with the entry into force of the new Criminal and Criminal Procedure Codes, updated versions of the key information systems of law enforcement agencies were launched in Kyrgyzstan. According to the press service of the Prosecutor General's Office of the Kyrgyz Republic, as of December 1, 2021, the following were fully transferred into electronic format and implemented throughout the republic: the updated AIS "Unified Register of Crimes", the new system "Unified Register of Offenses" (for the registration of offenses and administrative cases), as well as the updated version of the departmental electronic document management system of the prosecutor's offices¹.

As a result, the circulation of documents has significantly accelerated: whereas previously assignments, reports, and approvals could be delayed due to paper transmission, now

¹ Совет безопасности КР. Одобрение Концепции «Цифровой Кыргызстан 2019-2023» (пресс-релиз) // Наука, новые технологии и инновации Кыргызстана. – 2019. – № 10. – 300 с.



the process takes only minutes. The system ensures transparency – the leadership of the Prosecutor General's Office can control in real time the status of consideration of appeals and acts of prosecutorial response, which disciplines employees and reduces the risk of delays. Additionally, automation has simplified the preparation of statistics and analytics: the electronic registration of citizens' complaints allows for more precise tracking of the results of their consideration and identifying problem areas. The outcome of the first years of digitalization has been the reduction of bureaucratic burden, saving prosecutors' time, eliminating duplication of paper processes, and reducing costs for paper and postal services.

At the same time, digital transformation has revealed a number of challenges: the need for staff training, ensuring cybersecurity, and the difficulties of the transition period when paper and electronic processes were temporarily duplicated. To address these issues, large-scale training sessions were conducted, data protection was strengthened in cooperation with the State Enterprise "Tunduk," and domestic IT specialists were involved in development². An important direction was the use of foreign experience, primarily that of Kazakhstan: in 2022, employees of the Prosecutor General's Office of the Kyrgyz Republic attended a training course where they were presented with Kazakhstan's systems for the automation of the criminal process and internal document management, developed within the framework of the "Digital Kazakhstan" program. This experience was recognized as valuable and formed the basis for the creation of Kyrgyz electronic platforms: in the development of the URCO, the principles of the Kazakh Unified Register of Pre-Trial Investigations were taken into account, and the internal document management system was oriented toward the "Qadaǵalau" model. Thus, the digital infrastructure of the prosecutor's offices of the Kyrgyz Republic is developing on the basis of tested solutions of neighboring countries, which makes it possible to minimize

risks and accelerate the introduction of innovations³.

Back in the 2010s, Kazakhstan launched the state program "Digital Kazakhstan", within which a modern IT infrastructure was created for law enforcement agencies. The Prosecutor's Office of the Republic of Kazakhstan received several powerful information systems, integrated with each other. These include: the Unified Register of Pre-trial Investigations (URPI) – an electronic database for registering all criminal offenses and tracking the progress of their investigation; the Unified Register of Appeals – a database of appeals from citizens and legal entities to all state bodies; a number of specialized databases (for example, records of persons who have committed crimes, etc.). The central place among these solutions is occupied by the Unified Information and Analytical System "Qadaǵalau" of the General Prosecutor's Office of the Republic of Kazakhstan – a comprehensive electronic document management system for the prosecutor's office.

The "Qadaǵalau" system was implemented to automate the internal processes of the prosecutor's office and interaction with other state bodies. According to official information from the Committee on Legal Statistics of the General Prosecutor's Office of the Republic of Kazakhstan, the UIAS "Qadaǵalau" is designed to automate document management processes within the prosecutor's office, between territorial divisions, as well as to integrate with the unified electronic document management system of state bodies. In other words, "Qadaǵalau" is connected to interdepartmental electronic document management, which allows the prosecutor's office to promptly receive and send documents to other state bodies. The system itself accumulates all internal documents of the prosecutor's office, including inspection materials, supervisory proceedings, citizen appeals, and response acts. Thanks to this, the central office of the General Prosecutor's Office in Nur-Sultan (Astana) and regional prosecutor's offices can conduct online monitoring of the

² Совет безопасности КР. Одобрение Концепции «Цифровой Кыргызстан 2019–2023» (пресс-релиз) // Наука, новые технологии и инновации Кыргызстана. – 2019. – № 10. – С. 3–5.

³ Краткая информация об информационно-аналитических системах (в т.ч. ЕИАС «Қадағалау») // Комитет по правовой статистике Генеральной прокуратуры Республики Казахстан [Electronic resource] – Access mode: <https://www.gov.kz/memleket/entities/pravstat/press/article/details/17505> (Access date: 10.07.2025).



activities of subordinate divisions, carrying out so-called remote (cameral) supervision⁴.

The practical advantages of implementing “Qadaǵalau” in Kazakhstan are obvious. Firstly, daily operational control over the performance of duties by prosecutorial employees has been ensured. As explained in the materials of the General Prosecutor’s Office of the Republic of Kazakhstan, the system allows the head of the prosecutor’s office or a responsible controller to view the progress of consideration of each appeal in real time. If a delay or overdue deadline is approaching somewhere, an electronic notification is triggered, reminding of the approaching deadline [4].

The introduction of digital systems in the prosecutor’s office has significantly limited the human factor, eliminating the possibility of intentional delays and “forgetfulness”. A centralized electronic archive has simplified data search and analysis: employees with access can promptly find the necessary materials and compare them with similar cases. The abandonment of paper flows has reduced the burden on the apparatus – documents are not duplicated and do not require resending, which saves dozens of percent of time in coordination and dispatch. A significant effect has also been observed in the area of citizen appeals: the “Qadaǵalau” system allows real-time tracking of their status, monitoring compliance with deadlines, and responding to repeated complaints. Thanks to this, the number of repeated appeals has decreased, and violations are eliminated already at the stage of electronic monitoring. According to the General Prosecutor’s Office of the Republic of Kazakhstan, in some regions after the introduction of the UIAS, the number of justified complaints against state bodies decreased by more than 30%. The “Aiqyn” project provided citizens with online tools to monitor the fate of their appeals, which increased public trust and strengthened transparency of supervision⁵.

Kazakhstan’s experience has also revealed

challenges: the integration of disparate databases (URPI, “Qadaǵalau”, special records) required significant technical resources and time, but the creation of a unified data exchange gateway became an important achievement. Information security also became a challenge: powerful centralized systems require enhanced protection, so the General Prosecutor’s Office of the Republic of Kazakhstan uses international experience, including the practices of South Korea, and even engaged “ethical hackers” to test vulnerabilities. Great attention is paid to personnel training – the Academy of Law Enforcement Agencies introduced courses on digital literacy, big data skills, and cyber investigations⁶. As a result, Kazakhstan has built a holistic electronic document management system for the prosecutor’s office, recognized as one of the most successful in the region. This experience is highly valued by neighboring countries and international organizations and is actively used by Kyrgyzstan, which, implementing reforms with some delay, can directly rely on proven models and avoid mistakes.

In recent years, Uzbekistan has made a significant leap in the digitalization of public administration, and the prosecutor’s office has not been an exception. The strategic vision of these processes is reflected in Presidential Decree of the Republic of Uzbekistan No. UP-6079 of October 5, 2020, “On Approval of the Strategy ‘Digital Uzbekistan – 2030’ and Measures for Its Effective Implementation”. This decree approved a large-scale digital development strategy that envisages the introduction of modern ICT into all spheres, primarily into the system of public administration and justice. Within this strategy, programs of digital transformation have been approved for various sectors and regions, giving new momentum to reforms related to e-government. As noted by the Prosecutor General of the Republic of Uzbekistan, Nigmatilla Yuldashev, speaking at the meeting of the Coordination

⁴ Краткая информация об информационно-аналитических системах (в т.ч. ЕИАС «Қадағалау») // Комитет по правовой статистике Генеральной прокуратуры Республики Казахстан [Electronic resource] – Access mode: <https://www.gov.kz/memleket/entities/pravstat/press/article/details/17505> (Access date: 10.07.2025).

⁵ Внедрение цифровых технологий в органы прокуратуры Кыргызстана обсуждено на заседании // Координационный совет генеральных прокуроров государств-участников Содружества независимых государств [Electronic resource] – Access mode: <https://www.ksgp-cis.ru/news/news-item/2629> (Access date: 10.07.2025).

⁶ In the same place.



Council of Prosecutors General of the CIS in September 2021, comprehensive work is being carried out in the country on the full-scale digitalization of the activities of the prosecutor's office. This process is being implemented in line with the national strategy "Digital Uzbekistan – 2030" and includes several priority areas⁷.

Firstly, special attention is paid to the introduction of online control tools in the prosecutor's office of Uzbekistan. This refers to analogues of the above-described Kazakhstani practice: the creation of monitoring systems that allow the leadership of the prosecutor's office to control certain processes in real time. For example, the General Prosecutor's Office has introduced information panels displaying statistics on the consideration of citizens' appeals by region, the dynamics of identifying violations of the law, the workload of prosecutors, etc. Secondly, emphasis is placed on increasing the transparency of administrative procedures and minimizing direct contacts between prosecutors and citizens or representatives of supervised bodies. This is an important anti-corruption measure: when the submission of documents, complaints, and reports takes place through electronic portals, the ground for informal communication and potential abuse disappears⁸.

Thus, today in Uzbekistan an appeal to the prosecutor's office can be submitted online through the Unified Portal of Interactive Public Services, and prosecutors review it and provide a response also in electronic form. Thirdly, work is underway to improve interagency electronic interaction. The prosecutor's office is closely integrated with other bodies within the framework of the "Electronic Justice" system. In 2018, Uzbekistan introduced the Unified Electronic Database of Pre-Trial Proceedings, to which the Ministry of Internal Affairs, the State Security Service, and the prosecutor's office are connected. This is an analogue of the unified register of crimes: since 2018, all criminal cases are registered in an electronic system accessible for prosecutorial supervision. In addition, integration with the information systems of the courts is being implemented – prosecutors gain access to judicial case materials, which

facilitates their participation in proceedings, especially in the format of online hearings (relevant during the COVID-19 pandemic). The General Prosecutor's Office of the Republic of Uzbekistan, together with other agencies, is also working on creating a unified platform for electronic data exchange – the Uzbek analogue of Kazakhstan's SIO PSO gateway, in order to automatically extract information from various state databases (population registers, Ministry of Internal Affairs databases, tax databases, etc.) for supervisory needs [5].

One of the key achievements of digitalization in Uzbekistan has been the introduction of the electronic document management system (EDMS), covering both the central office and regional prosecutor's offices. It made it possible to abandon paper-based exchange and create a unified electronic archive, which significantly accelerated document processing and simplified access to them. On its basis, a legal statistics database is being formed: indicators of the prosecutor's office's activities (number of inspections, protests, appeals, etc.) are automatically generated from the entered data. Electronic technologies have ensured process transparency, eliminated the possibility of "unrecorded" cases, and allowed the introduction of data analysis tools to identify hidden crime and regional patterns. For citizens, an online portal of the General Prosecutor's Office has been created, where one can track the status of an appeal, obtain statistics, and make an appointment. An important step was the updating of legislation: since 2021, electronic evidence has been recognized as equivalent to traditional forms, which has encouraged investigative bodies to actively use digital materials [5].

At the same time, digital transformation has also revealed a number of problems. One of them was a shortage of personnel in the field of cyber law and data analytics, which required the creation of the Academy of the General Prosecutor's Office to train specialists, including in the format of distance learning. Another challenge was funding, since reforms require investments in equipment, software, and data protection. Particular attention is paid

⁷ Об утверждении Стратегии «Цифровой Узбекистан – 2030» и мерах по ее эффективной реализации: указ Президента Республики Узбекистан от 05 окт. 2020 г. № УП-6079. – Национальная база данных законодательства – Lex.uz. – Дата публикации: 06.10.2020.

⁸ In the same place.



to cybersecurity: international experience is used, including cooperation with South Korea, where Uzbek prosecutors underwent training in combating cybercrime. In parallel, work is underway to master artificial intelligence technologies: systems of automated case distribution and crime risk forecasting based on big data are being tested. As a result, in a short period (2020-2023), Uzbekistan has built a digital ecosystem of the prosecutor's office, integrating it into the "Electronic Government" system, which allowed the country to reach the level of Kazakhstan in terms of digitalization of supervisory bodies [6].

The Russian Federation is developing the digitalization of the prosecutor's office along its own trajectory. The first steps were taken back in the early 2000s, when the State Automated System of Legal Statistics (SASLS) began operating. However, only by the end of the 2010s did the need for comprehensive transformation arise: individual projects required unification into a strategic platform. In 2017, the Concept of Digital Transformation of the Prosecutor's Office Bodies until 2025 was approved, aimed at creating a unified information environment, developing electronic document management, introducing big data and AI technologies, as well as training personnel. The document provides for a two-stage implementation and sets the strategic vector of modernization [7].

The central element of the digital infrastructure for a long time remained the SASLS system, which accumulates arrays of statistics on crime and the activities of law enforcement agencies. Despite the presence of a technical base, for a long time the system was used formally and not to its full extent. The problem remained the limited implementation of analytical tools and insufficient staff training. Russian researchers emphasize that the full use of GAS PS can increase the effectiveness of prosecutorial supervision and bring the work of the prosecutor's office closer to modern standards of data management.

Since the late 2010s, the development of new digital solutions has begun. The corporate electronic document management system (SED) was launched, uniting the General Prosecutor's Office, regional and most district prosecutor's offices. Specialized subsystems appeared –

"Supervision", "Personnel", "Electronic Archive". In 2021, the Concept of Digital Transformation was adjusted: emphasis was placed on designing a unified data platform of the prosecutor's office and developing interdepartmental interaction. By 2025, an integrated "one window" system is planned, allowing the consolidation of all key information resources and databases [8].

The results of digitalization are already noticeable. Document management has accelerated and become almost completely electronic, analytical capacity has increased thanks to databases and statistical tools. Citizens have gained more opportunities for online appeals and making appointments, and archives are being converted into digital form. However, problems remain: system fragmentation, resistance from part of the staff, security issues in handling classified information, dependence on the budget and transition to domestic software. These factors restrain dynamics, but do not stop the digitalization process.

Prospects are associated with the introduction of artificial intelligence technologies and big data analysis. Solutions are already being tested for the automatic detection of corruption risks in contracts or sorting citizens' appeals using natural language processing algorithms. In the scientific community, the concept of a "digital prosecutor" is being discussed, implying a software complex of assistants rather than replacing a human. In the next 5-10 years, a gradual expansion of AI use in routine processes is likely while maintaining human control over supervisory decisions. Thus, the Russian prosecutor's office is moving towards creating a unified digital ecosystem that combines the efficiency of technology with traditional guarantees of legality [8].

Considering the foreign experience of electronic document management and the digitalization of the prosecutor's office, particular interest is represented by examples of countries that have achieved outstanding success in the field of e-government. These include the Republic of Korea (South Korea) and China.

The Republic of Korea is rightfully considered one of the world leaders in the introduction of information technologies in public administration and the justice system. For many years, South



Korea has topped the UN rankings on the development of e-government. In the judicial and legal sphere of Korea, a set of innovative solutions has been implemented, covering the prosecutor's office as well. The key platform here is KICS (Korea Information System of Criminal Justice Services). The KICS system was developed through the joint efforts of the Ministry of Justice, the prosecutor's office, the police, and the judiciary, and was put into operation in 2010. Essentially, KICS is a unified electronic platform that combines all stages of the criminal process – from the investigation stage (police, prosecution) to trial and execution of the sentence. Various agencies are connected to a federated information system, providing seamless data exchange and integration between law enforcement agencies in real time [9].

As a result of the implementation of KICS, the efficiency and coordination of the criminal justice bodies in Korea increased significantly. Prosecutors through KICS instantly receive materials of criminal cases from the police, can electronically authorize procedural actions, and send cases to court in digital form. Judges, in turn, using the system, return procedural documents, verdicts, etc. to the prosecutor's office. The “one-stop shop” principle has been implemented: all participants – police, prosecution, court, correctional service – work on a common platform, while maintaining distributed access rights (each sees their own information, and general data are integrated). Such an architecture has eliminated duplication of information, reduced delays in case transfers, and significantly reduced costs. According to a World Bank report, the South Korean KICS system ensured significant savings of money and time, improved the collection of criminal statistics, and provided opportunities for new online services for the population (for example, informing victims about the progress of a case). In addition, Korea successfully implemented an electronic trial system (e-trial) for certain categories of cases, as well as an electronic criminal punishment system (electronic monitoring of convicts). All these elements are interconnected with the work of the prosecutor's office through common digital tools.

An important factor in Korea's success was the combination of technological equipment and thoughtful change management. Korean experts note that cultural acceptance of technologies in justice turned out to be no less important than the technologies themselves. Overcoming the skepticism of some employees and ensuring a high level of cybersecurity, the leaders of the prosecutor's office and the courts achieved trust in electronic systems. Now in Korea, electronic interaction between the prosecutor's office and other bodies has become routine. The KICS model is often cited as an example for other countries striving to integrate their law enforcement systems. For Kyrgyzstan and neighboring countries, Korea's experience shows how far integration can go – up to a complete rejection of fragmented departmental databases in favor of a unified justice infrastructure. Of course, it is difficult to implement the Korean level immediately, but certain components (for example, an interagency criminal justice portal) can be adopted [9].

The next striking example is the People's Republic of China, where digital technologies penetrate all levels of the law enforcement system. China stands out primarily for its innovations in the field of artificial intelligence in the service of justice. Since the mid-2010s, China has been implementing the “Smart Justice” program, and the prosecutor's office is actively participating in it. It is known that since 2016, prosecutors in China have begun using a specialized AI tool called “System 206” to assist in criminal proceedings. The “206” system is used in Shanghai and other cities: it helps prosecutors assess the completeness and sufficiency of evidence in a case, check materials for contradictions, and ensure the standardization of indictments. Essentially, it is an intelligent assistant that analyzes case data (interrogation protocols, physical evidence, expert opinions) and points out weak spots to the prosecutor or, conversely, confirms the validity of the charge. Importantly, the final decision remains with the human prosecutor, but AI saves time and improves quality [9].

China's most high-profile achievement was the creation in 2021 of a prototype “digital prosecutor” based on artificial intelligence. A



group of scientists from the Shanghai People's Procuratorate, together with the Chinese Academy of Sciences, developed an algorithm capable of independently filing charges in the most common criminal cases. According to the South China Morning Post, this AI prosecutor was trained on data from 17,000 cases and can bring charges in 8 typical crimes (credit card fraud, organizing gambling, dangerous driving, intentional injury, obstructing official duties, theft, fraud, and provoking disturbances) with an accuracy of up to 97%. The new technology was tested in the People's Procuratorate of Pudong District of Shanghai, and scientists believe that it will reduce the daily workload of prosecutors, freeing them up for more complex tasks. Essentially, the AI-based system analyzes the case description and finds in it the characteristic features of a specific crime, formulating a ready-made indictment. Of course, so far this "digital prosecutor" is capable of covering a limited list of simple cases, and further expansion of its capabilities is planned [10].

China's experience is impressive, but also raises discussions regarding ethical and legal aspects. The vast majority of experts agree that AI should be only an auxiliary tool, not a replacement for a human prosecutor, especially when making responsible decisions. Nevertheless, China's achievements demonstrate potential: artificial intelligence can significantly increase the efficiency and objectivity of prosecutorial activities, eliminating routine operations and the human factor of errors. In addition, other digital technologies are widely used in China: electronic databases of prosecutorial supervision, big data systems for crime analysis, online platforms for handling citizens' appeals, etc. The PRC prosecutor's office is also integrated with the national social credit system and police databases, which allows automating a number of verification functions [11].

For the countries of Central Asia, the Chinese path is in many ways unique due to its scale and resource support, but certain elements (for example, data analysis algorithms) are already being adopted. Thus, Uzbekistan is considering the possibility of introducing analytical programs for anti-corruption supervision following the

Chinese model (this is mentioned by Uzbek authors and officials). In Kazakhstan and Kyrgyzstan, there are still no such projects with AI prosecutors, but conceptually the possibility of their appearance has been laid down – the same digitalization strategies mention the prospects of using artificial intelligence [12, 854 p.].

Summing up the review of foreign experience, we note: the Republic of Korea demonstrates an example of an integrated system of electronic justice, where the prosecutor's office is an organic element of a unified digital platform, and China is an example of advanced AI technology in prosecutorial activity. Both experiences are valuable in their own way. For Kyrgyzstan and neighboring countries, the Korean experience is more institutionally applicable – it shows how to create and establish interaction between various bodies through electronic document management. The Chinese experience, on the other hand, inspires in the long term, indicating what horizons open up thanks to the bold introduction of artificial intelligence and big data.

Conclusion. The development of electronic document management in the prosecutor's office has become a strategic priority for Kyrgyzstan, and in recent years the country has built a solid foundation of digitalization: the Unified Register of Crimes and Offenses was launched, an electronic document management system was introduced, and online interaction with law enforcement agencies was established. At the same time, Kazakhstan demonstrates the best example in the region: its "Qadağalau" system, integration with interdepartmental EDM, and automated control of appeals have become a benchmark of efficiency and are already being adapted in the Kyrgyz Republic. Kazakhstan's experience allows Kyrgyzstan to accelerate transformation and avoid mistakes, ensuring transparency and improved quality of prosecutorial oversight.

Kyrgyzstan consistently draws on the experience of other countries as well. Uzbekistan has shown how quickly electronic systems can be implemented with political will, Russia provides models for building methodological frameworks and training personnel, while South Korea and China demonstrate how modern



technologies and AI can radically enhance prosecutorial efficiency. For Kyrgyzstan, it is important to combine its own initiatives with international best practices, expanding pilot projects on data analytics and civic control.

Thus, the digitalization of the prosecutor's office in Kyrgyzstan is becoming an integral element of legal modernization, leading to resource savings, reduced corruption risks, and the strengthening of the rule of law.

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