

Nepotism and Favoritism in the Comoros: Constitutional Reconfigurations and Empirical Analysis in Public Law (2016–2019)

SOILIHI MOHAMED¹

PhD in Public Law and Political Science

Lecturer-Researcher, University of the Comoros

Department of Law, University of the Comoros, Comoros

Research Center for Development (CRD), Catholic University of Madagascar, Madagascar

Abstract

This article explores the dynamics of nepotism and favoritism in the Comoros from 2016 to 2019, a period characterized by profound constitutional and political transformations. Drawing on both available quantitative indicators and a critical public law analysis, the study examines how institutional reforms reshaped the foundations of executive power and its relationship to democratic governance. The constitutional referendum of July 30, 2018 marked a turning point by abolishing the system of rotating presidencies across the islands, eliminating the vice-presidencies, and transferring jurisdiction over constitutional review from the Constitutional Court to the Supreme Court. These reforms were followed by the early presidential election of March 2019, organized in a tense political climate that further consolidated the presidency and reduced the institutional checks on executive authority. Methodologically, the article combines empirical data on electoral participation, press freedom, and governance quality with constitutional principles such as equal access to public office and the separation of powers. The analysis demonstrates that this process of institutional recentralization significantly increased executive discretion, thereby heightening the structural risks of nepotism and favoritism within public administration and political appointments. The article concludes by proposing an analytical framework linking institutional vulnerabilities to potential reforms. It offers recommendations aligned with comparative standards of democratic governance, aiming to enhance transparency, accountability, and the rule of law in emerging democracies.

Keywords: Comoros; Constitutional reforms; Executive power; Favoritism; Institutional indicators; Nepotism.

INTRODUCTION

The Comoros provide a remarkable laboratory for the study of constitutional institutions within an insular and plural context. Since independence in 1975, the country has undergone a series of structural political transformations characterized by chronic instability, including military coups, but also by innovative mechanisms designed to ease regional tensions, such as the rotation of the presidency among the islands (Azali 2003; Ijichi & Zélia 2017).

¹ Dr. Soilihi Mohamed, PhD in Public Law and Political Science (Catholic University of Madagascar) and Engineer in Geotourism, Ecotourism, and Georisk (University of Antananarivo), is a Lecturer-Researcher and Director of the “*Laboratoire Dynamique Économique et Juridique du Secteur Formel et Informel*” at the University of the Comoros. His research focuses on environmental law, governance, and the integration of environmental policies into sustainable development. Corresponding author: soilihimohamed34@gmail.com

Introduced in the early 2000s, this rotation system reflected a consociational logic as theorized by Lijphart (1977, 2004), allowing for a distribution of power aimed at preventing the lasting hegemony of any single island (Abdou 2015). The vice-presidencies and the autonomous Constitutional Court served as essential counterweights, ensuring both territorial representation and judicial independence (Rabarijohn 2012; Meftah & Bino 2019).

The period from 2016 to 2019 marked a major institutional turning point in the Comoros, driven by four pivotal events. First, the constitutional referendum of July 30, 2018, profoundly reshaped the political architecture by abolishing the rotational presidency, eliminating the three vice-presidencies, and transferring the powers of the Constitutional Court to the Supreme Court (ConstitutionNet/IDEA 2018; LoC 2018). This text was approved by roughly 92.7 percent of “Yes” votes, with a turnout ranging from 61 to 64 percent, according to data from the International Foundation for Electoral Systems (IFES 2018) and Al Jazeera (2018).

Second, the early presidential election of March 24, 2019, won by the incumbent president with nearly 59–61 percent of the vote and a turnout of about 53 percent, was held in a context marked by political contestation and arrests of opposition figures (IFES 2019; Freedom House 2019).

Public liberty indicators show a significant deterioration. In 2019, Freedom House gave the Comoros a score of 42/100 (“Partly Free”), indicating limited political and civil liberties and fragile democratic institutions (Freedom House 2019). Likewise, Reporters Without Borders ranked the Comoros 56th out of 180 countries for press freedom, an index assessing pluralism, media independence, the legal and security environment, and institutional transparency (RSF 2019). This score highlights a media landscape under political and institutional pressure, limiting diversity and autonomy of information.

Institutional analyses point to a worrying recentralization of executive power in the Comoros, particularly on Grand Comore, following the 2018 reforms, as confirmed by the political context of 2019 (ConstitutionNet/IDEA 2018; LoC 2018). Specifically, abolishing the rotational presidency ended a mechanism of balance that had ensured, since the early 2000s, a territorial alternation aimed at reducing inter-island tensions and limiting power concentration. These developments, documented by reliable sources, depict an institutional environment conducive to centralization and personalization of power.

From both a theoretical and jurisprudential standpoint, these institutional transformations challenge the fundamental principles of Comorian public law as well as international norms ratified by the country. The principle of equal access to public employment, enshrined in Article 22 of the Constitution of the Union of the Comoros adopted on July 30, 2018, and in Article 2(a) of the African Charter on Democracy, Elections and Governance adopted by the African Union on January 30, 2007, requires selection based on merit rather than political or territorial affiliation. Similarly, the prohibition of arbitrariness, guaranteed by Article 3 of the Constitution and recognized in comparative administrative law (for example, the Court of Cassation of Senegal, 2010), requires that any administrative decision be based on objective and verifiable grounds. Moreover, the separation of powers, which presupposes the existence of an autonomous constitutional court, remains the indispensable foundation of any rule-of-law state (Sadiki 2014; Brière 2016).

Since the 2018 constitutional revision, institutional balances have been profoundly disrupted: the combination of an increasingly centralized executive, a

weakening of counter-powers, and deteriorating public liberty indicators now raises a fundamental question. To what extent have the institutional transformations between 2016 and 2019 increased the structural probability of nepotistic or clientelist behaviors on the part of the executive? More broadly, how has the gradual deactivation of control mechanisms and the reduction of institutional transparency opened the way for favoritism, even in the absence of formal evidence of individual abuses?

To address this issue, the article adopts an interdisciplinary and comparative approach. It mobilizes electoral data provided by the International Foundation for Electoral Systems (IFES 2018, 2019) and indicators of political and civil liberties from Freedom House (2019) and Reporters Without Borders (RSF 2019). It also incorporates institutional analyses from the International IDEA report published on the ConstitutionNet platform in 2018, as well as a detailed examination of Comorian constitutional texts. Finally, the study relies on a doctrinal and comparative framework, contrasting the Comorian experience with that of other African island states and international standards of good governance.

The objective of this approach is, first, to assess the institutional risks generated by the 2016–2019 reforms and, second, to propose realistic reforms reconciling Comorian normative specificities with the universally recognized principles of public law and international standards of good governance.

The article is structured into four main sections. The first outlines the conceptual and doctrinal framework, defining the notions of favoritism, nepotism, and administrative impartiality, as well as the principles of separation of powers and equal access to public office. The second section presents the data corpus and methodology used to combine electoral, institutional, and public liberty indicators with legal analysis. The third section sets out the results and analyses through a summary table and an analytical framework linking observed indicators to risk levels, highlighting mechanisms of power concentration and weakening of counter-powers. Finally, the fourth section offers a discussion, underscores the study's limitations, and proposes avenues for strengthening transparency, impartiality, and democratic governance in the Comoros.

CONCEPTUAL AND DOCTRINAL FRAMEWORK

Analyzing nepotism and favoritism in the Comorian context requires a preliminary conceptual clarification and a solid doctrinal grounding. In the academic literature, favoritism refers to the allocation of public offices, contracts, or institutional advantages based on partisan, personal, or territorial criteria, in violation of the principles of impartiality and transparency. Nepotism constitutes a specific form of favoritism when it benefits family members or close relatives, making it particularly controversial as it directly contravenes the principles of equal access and the neutrality of the public administration (Transparency International 2016; OECD 2020). In other words, the further public action deviates from impersonal, objective, and public criteria, the greater the risk of biased allocation of resources and positions, even in the absence of explicit evidence of corruption or clientelism (Rothstein and Teorell 2008).

Modern public law largely converges on certain cardinal principles. First, the principle of impartiality requires that administrative action be based on general rules, publicly available, and equally applicable to all. Rothstein and Teorell (2008), placing impartiality at the heart of the concept of *Quality of Government*, explicitly link the quality of institutions to the requirement of equality before the law. Second, the

principle of equal access to public office, enshrined in Article 22 of the Constitution of the Union of the Comoros adopted on 30 July 2018 and in Article 7 of the African Charter on Democracy, Elections and Governance adopted by the African Union on 30 January 2007, obliges states to ensure that recruitment and promotion decisions are based on merit and competence rather than partisan or personal affiliations.

Similarly, Article 7 of the United Nations Convention against Corruption, adopted by the United Nations General Assembly on 31 October 2003, imposes clear obligations on States Parties concerning prevention, transparency, and accountability in public administration, including the regulation of conflicts of interest and the publicity of recruitment procedures. The Organisation for Economic Co-operation and Development (OECD) has complemented this normative framework through its *Recommendation on Public Integrity* (OECD 2017) and the *Public Integrity Handbook* (OECD 2020), both emphasizing the traceability of decisions, the publication of selection criteria, and the establishment of independent oversight mechanisms to limit administrative discretion.

These international requirements converge with the empirical literature on administrative meritocracy. The pioneering work of Evans and Rauch (1999) demonstrated that bureaucracies based on meritocratic recruitment, competitive examinations, and stable careers are associated with lower levels of corruption and improved administrative performance. Similarly, Dahlström, Lapuente, and Teorell (2012), analyzing a broad cross-country dataset, showed that the professionalization of public administrations, understood as selection based on merit rather than political loyalty, constitutes a major institutional deterrent to corruption and favoritism. These empirical findings underline that systems with transparent and rule-based recruitment structures structurally limit opportunities for nepotistic practices, whereas regimes marked by political centralization and weak independent oversight mechanically increase the probability of institutional favoritism.

Moreover, the Comorian case must be situated within the broader context of pluralist regimes and segmented democracies. As Lijphart (1977, 2004) has demonstrated, power-sharing arrangements, such as rotating executive offices, proportional representation, and mutual veto mechanisms, tend to reduce the risk of institutional capture by multiplying decision-making centers and increasing the cost of authoritarian concentration. Their weakening, by contrast, consolidates executive power and diminishes incentives for compromise, thereby creating a wider space for clientelism and favoritism. The 2018 abolition of the rotational presidency and of the specialized Constitutional Court, replaced by a Supreme Court with expanded competencies as documented by International IDEA (2018) and the Law Library of Congress (2018), represents a clear rupture with the earlier consociational architecture designed precisely to safeguard territorial and institutional balance.

Finally, any analysis of favoritism risks must account for the role of public freedoms and press independence. The governance literature (Kaufmann, Kraay, and Mastruzzi 2010; RSF 2019) highlights that freedom of expression and an active civil society act as indirect safeguards against institutional capture by raising the reputational and political costs of nepotistic practices. When press freedom declines and institutional counterbalances weaken simultaneously, the probability of discretionary allocation increases mechanically due to the absence of effective social and judicial oversight.

Taken together, this conceptual and doctrinal framework reveals a clear convergence: whether considering international legal norms (United Nations

Convention against Corruption (2003); African Charter on Democracy (2007); OECD 2017, 2020), empirical studies on administrative meritocracy (Evans and Rauch 1999; Dahlström, Lapuente, and Teorell 2012), power-sharing theories (Lijphart 1977, 2004), or analyses of quality of government (Rothstein and Teorell 2008), all point toward the same conclusion. The more institutions guarantee equal access, administrative impartiality, transparent recruitment, and pluralism of counter-powers, the more they structurally limit the space for favoritism and nepotism. Conversely, any weakening of these safeguards, whether through political recentralization, the transfer of oversight powers to less independent bodies, or restrictions on public liberties, creates an environment conducive to the rise of institutional favoritism, even in the absence of direct evidence of individual misconduct.

METHODOLOGY AND DATA

The assessment of the structural probability of favoritism and nepotism in the Comoros between 2016 and 2019 relies on a mixed-method design that combines quantitative analysis of electoral, institutional, and public liberty indicators with a qualitative and legal examination of the constitutional and political transformations that occurred during the period under study. Such an integrated approach is necessary to move beyond subjective impressions or isolated denunciations by grounding the analysis in verifiable empirical data while interpreting them in light of public law principles, international good governance standards, and the academic literature on administrative integrity and corruption control (Evans and Rauch 1999; Dahlström, Lapuente, and Teorell 2012; Rothstein and Teorell 2008).

On the quantitative side, several primary sources and international databases have been mobilized. Official electoral results come from the *International Foundation for Electoral Systems (IFES)*, which provides a consolidated global database of elections. This includes the figures for the constitutional referendum of 30 July 2018, registered voters, votes cast, turnout rate, and results by voting option, as well as those for the presidential election of 24 March 2019, detailing turnout rates and candidates' vote shares (IFES 2018; IFES 2019). Expressed in both absolute numbers and percentages, these data quantify electoral dynamics and shed light on the degree of popular legitimacy claimed by Comorian authorities during this institutional sequence.

Additional information comes from international governance and public liberty indices, such as the *Freedom in the World 2019* report by Freedom House, which assigned the Union of the Comoros an overall score of 42/100, classifying it as "Partly Free," and documenting restrictions on political opposition, independent media, and civil society organizations (Freedom House 2019). Similarly, the *World Press Freedom Index* published by Reporters Without Borders (RSF) ranked the Comoros 56th out of 180 countries in 2019, highlighting a deteriorating media environment and increased pressure on journalists (RSF 2019). Although these indicators do not directly measure nepotism, they serve as institutional proxies: as political and media freedoms decline, the reputational and political costs of partisan or familial appointments decrease, widening the space for favoritism, as emphasized in the governance and public accountability literature (Kaufmann, Kraay, and Mastruzzi 2010).

On the qualitative side, the analysis draws on institutional reports and specialized analyses produced by the *International Institute for Democracy and Electoral Assistance (International IDEA)*, which has published several briefs on the political and legal consequences of the 2018 referendum abolishing the rotational

presidency, eliminating the vice-presidencies, and transferring the Constitutional Court's competencies to the Supreme Court (International IDEA 2018). Likewise, the *Law Library of Congress* issued a detailed synthesis in 2018 on the announcement and organization of this referendum, highlighting political tensions and criticisms voiced by the opposition and civil society actors (Law Library of Congress 2018). These documents provide essential insights into the institutional context and the official or implicit motivations behind the reforms, linking legal changes to the political and social dynamics surrounding them.

The methodological approach thus systematically cross-references quantitative and qualitative data to build a set of converging indicators: electoral results and public liberty indices offer an empirical measure of political legitimacy and institutional openness, while the analysis of constitutional texts, institutional reports, and specialized commentaries assesses their legal implications for separation of powers, institutional balance, and guarantees of impartiality in access to public office. In other words, the goal is less to demonstrate individual acts of nepotism than to evaluate the structural probability of institutional favoritism created by the combination of executive power recentralization, judicial counter-power weakening, and declining transparency and democratic contestation spaces.

Finally, to ensure methodological robustness and scientific validity, all indicators are cross-checked against doctrinal principles and international good governance norms previously discussed (United Nations Convention against Corruption (2003); African Charter on Democracy (2007); OECD 2017, 2020). This methodological triangulation not only describes the transformations observed in the Comoros between 2016 and 2019 but also measures their normative implications in terms of risks for impartiality, equal access, and transparency in the exercise of state power.

RESULTS AND ANALYSIS

1. Descriptive Results

The examination of quantitative and qualitative data covering the 2016–2019 period provides a detailed picture of the institutional and political transformations that occurred in the Comoros. On the one hand, electoral results published by the *International Foundation for Electoral Systems (IFES)* offer reliable figures regarding the constitutional referendum of 30 July 2018 and the early presidential election of 24 March 2019. On the other hand, reports from *Freedom House*, *Reporters Without Borders (RSF)*, as well as analyses produced by the *International Institute for Democracy and Electoral Assistance (International IDEA)* and the *Law Library of Congress* complement these data with a qualitative assessment of the political climate, institutional reforms, and public freedoms during the period under consideration.

According to IFES (2018), the referendum of 30 July 2018, which sought to amend the Constitution in depth, recorded a total of 301,006 registered voters, namely Comorian citizens of legal voting age meeting the eligibility requirements, and 185,578 voters, representing an official turnout of 61.6 percent. Among those who voted, 172,240 chose the “Yes” option, that is, 92.7 percent of valid votes, thereby approving the abolition of the rotational presidency, the elimination of the three vice-presidencies, and the transfer of competencies from the Constitutional Court to the Supreme Court (International IDEA 2018). The Independent National Electoral Commission (CENI), cited by Al Jazeera (2018), reported a slightly higher turnout rate of 63.9 percent, reflecting minor discrepancies between sources but not altering the overall finding of

strong popular approval in a context marked by the opposition’s boycott (Law Library of Congress 2018).

The early presidential election of 24 March 2019, organized one year after the referendum, recorded a turnout of 53 percent and resulted in the re-election of incumbent President Azali Assoumani with 59–61 percent of the votes, according to IFES (2019). However, *Freedom House* (2019) documented arrests of opposition leaders, restrictions on freedom of expression, and irregularities denounced by independent observers, leading the organization to assign the Comoros an overall score of 42/100, classifying the country as “Partly Free.” Likewise, *Reporters Without Borders* (RSF 2019) ranked the Comoros 56th out of 180 countries in its *World Press Freedom Index*, pointing to a shrinking media space and increased pressure on journalists critical of the government.

The institutional reforms resulting from the 2018 referendum marked a major turning point: the abolition of the rotational presidency, introduced in 2001 to guarantee island alternation among Ngazidja, Ndzuwani, and Mwali, ended what scholars had considered a pact of territorial stability (Lijphart 2004; International IDEA 2018). Similarly, the elimination of the three vice-presidencies reinforced the centralization of executive power, while the transfer of competencies from the Constitutional Court to an expanded Supreme Court weakened judicial independence by reducing both the specialization and autonomy of constitutional oversight bodies (Law Library of Congress 2018).

To synthesize these findings, Table 1 below summarizes the main electoral, institutional, and political indicators for the 2016–2019 period, highlighting their implications for the balance of powers and the quality of governance in the Comoros.

Table 1 : Main Electoral, Institutional, and Political Indicators (2016–2019)

Event / Indicator	Key Results	Main Sources	Institutional Implications
Constitutional Referendum (30/07/2018)	301,006 registered voters; 185,578 voters; 92.7% “Yes”; 61.6% turnout (IFES); 63.9% turnout (CENI)	IFES 2018; Al Jazeera 2018; IDEA 2018	Abolition of rotational presidency; elimination of vice-presidencies; transfer of Constitutional Court powers → Supreme Court
Presidential Election (24/03/2019)	53% turnout; 59–61% votes for incumbent president	IFES 2019; Freedom House 2019	Executive consolidation; opposition contestation; arrests of opposition figures
Public Liberties	Overall score 42/100 (“Partly Free”)	Freedom House 2019	Shrinking political and civic space
Press Freedom	56th / 180 countries	RSF 2019	Increased pressure on journalists; decline in media pluralism
Institutional Reforms (2018)	Abolition of rotational presidency; elimination of vice-presidencies; transfer of judicial competencies	IDEA 2018; Law Library of Congress 2018	Centralization of executive power; weakening of institutional counter-powers

Source: *IFES 2018; Al Jazeera 2018; International IDEA 2018; IFES 2019; Freedom House 2019; Reporters Sans Frontières 2019; Law Library of Congress 2018.*

The convergence of these data highlights a dual dynamic: on the one hand, electoral legitimization through a referendum overwhelmingly approved and a presidential election won in the first round; on the other hand, a progressive concentration of executive power at the expense of territorial power-sharing mechanisms, judicial specialization, and political and media freedoms. As emphasized in the literature on democratic governance and public integrity (Rothstein and Teorell 2008; Dahlström, Lapuente, and Teorell 2012), such setbacks create an institutional environment

conducive to increased administrative discretion and, consequently, to the structural probability of favoritism and nepotism.

2. Legal and Institutional Analysis

Interpreting the data presented above requires situating them within the framework of constitutional principles and international standards structuring the contemporary rule of law. The 2016–2019 period in the Comoros cannot be understood merely as a sequence of electoral events or institutional revisions. It must instead be read as a deeper process of executive power reconfiguration with major implications for separation of powers, administrative impartiality, and transparency in public appointments.

As Rothstein and Teorell (2008) remind us, the quality of government depends less on the mere formal regularity of elections than on the ability of institutions to ensure impartial decision-making, based on general and predictable rules rather than discretionary or personal considerations. Yet, converging indicators, from electoral results documented by IFES (2018, 2019), institutional reforms reported by International IDEA (2018) and the Law Library of Congress (2018), to political and media freedom indices provided by Freedom House (2019) and Reporters Without Borders (2019), show that the Comoros during 2016–2019 experienced a gradual weakening of counter-powers and an increasing centralization of decision-making within the executive branch.

From a constitutional perspective, the abolition of the rotational presidency, introduced in 2001 as a consociational mechanism guaranteeing territorial alternation among Ngazidja, Ndzuwani, and Mwali to prevent the domination of a single island, constitutes a significant rupture with the logic of power-sharing analyzed by Lijphart (2004). Literature on segmented democracies demonstrates that territorial and communal inclusion mechanisms reduce incentives for authoritarian power capture by making unilateral decisions more costly and multiplying veto players, actors or institutions whose agreement is required for policy adoption and who can limit its unilateral character (Tsebelis 2002). Conversely, their abolition concentrates decision-making levers and rewards political loyalty rather than competence as the criterion for access to positions of responsibility, thereby creating an institutional environment where favoritism becomes structurally more likely.

The elimination of the three vice-presidencies reinforces this finding. Initially designed as guarantees of territorial representation and power-sharing within the executive, they also served as internal counterweights to presidential authority. Their abolition, approved by the 2018 referendum (IFES 2018), consolidated all decision-making prerogatives in the hands of the president, reducing collegiality and, consequently, mechanisms of transparency and internal accountability. Governance literature demonstrates that such concentration mechanically increases administrative discretion, understood as the ability of the executive to make appointments or allocate resources according to opaque or non-meritocratic criteria (Dahlström, Lapuente, and Teorell 2012).

Even more concerning is the transfer of competencies from the Constitutional Court to an expanded Supreme Court. Comparative constitutional law regards the existence of a specialized and independent constitutional court as a fundamental safeguard against authoritarian excesses and arbitrary decisions (Brière 2016). When constitutional review is absorbed by a generalist court with multiple functions, two risks arise: first, the specialization of constitutional review weakens; second, functional

or hierarchical dependence on the executive may indirectly influence the extent and rigor of judicial scrutiny over government acts. Thus, the 2018 reform, by abolishing the autonomous Constitutional Court, lowered the institutional cost of potential partial or discretionary decisions, since the judicial body responsible for reviewing them no longer enjoys the same degree of independence or specialization (Law Library of Congress 2018; International IDEA 2018).

Added to this is the decline in public and media freedoms documented by Freedom House (2019) and RSF (2019). Literature on democratic accountability (Kaufmann, Kraay, and Mastruzzi 2010) emphasizes the central role of the press and civil society in reducing information asymmetries and exposing governmental practices. When journalists are intimidated, opposition figures arrested, and critical voices marginalized, the reputational and political costs of partial decisions fall sharply, thereby expanding the space for institutional favoritism and nepotism. In the Comoros, the reduction of freedoms, combined with institutional centralization, has created a dynamic detrimental to administrative impartiality and equal access to public office.

Finally, it is essential to underscore that these institutional transformations unfolded despite clear international obligations. The United Nations Convention against Corruption (2003) obliges States Parties to adopt policies ensuring prevention, transparency, and accountability in public administration. Similarly, the African Charter on Democracy, Elections and Governance (2007) commits African states to guarantee equitable access to public responsibilities, separation of powers, and respect for the rule of law. The 2017 and 2020 Recommendations of the Organisation for Economic Co-operation and Development (OECD) emphasize the importance of open procedures, publicly available selection criteria, and independent oversight mechanisms to prevent institutional capture. By progressively deviating from these standards, the Comorian reforms of 2018–2019 have increased the structural probability of favoritism, not necessarily through proven individual acts, but because the institutional architecture itself has reduced guarantees of transparency, impartiality, and accountability.

Taken together, the combined reading of empirical data and legal principles leads to a clear conclusion: the 2016–2019 period in the Comoros was marked by erosion of counter-powers, executive power centralization, and shrinking democratic space, factors that, according to both academic literature and international standards, create an institutional environment conducive to rising favoritism and nepotism.

3. Analytical Framework for Indicators and Risk Levels

The assessment of the structural probability of favoritism and nepotism cannot be limited to a simple juxtaposition of quantitative and qualitative data. It also requires an analytical transformation of this information into institutional risk levels, taking into account electoral results, constitutional reforms, and the state of political and civil liberties. Within this perspective, the construction of an *Analytical Framework for Indicators and Risk Levels* makes it possible to identify, for each key domain, the degree of vulnerability of the Comorian political system to favoritism and nepotism—not on the basis of proven individual acts, but rather according to the institutional architecture and the political context that make such practices more or less probable.

Electoral data from IFES (2018, 2019) indicate that both the constitutional referendum of 30 July 2018 and the early presidential election of 24 March 2019 were marked by moderate turnout rates (61.6% for the referendum, 53% for the presidential election) and overwhelming victories for the presidential camp (92.7% “Yes” for the

referendum, 59–61% for the incumbent president). The literature on democratic legitimacy (Dahl 1989; Norris 2014) underlines that such electoral asymmetry, when combined with a weakening of institutional counter-powers and restrictions on political freedoms (Freedom House 2019), increases executive discretion and reduces the ability of institutions and civil society to monitor appointments and public resource allocation. Consequently, the structural risk of favoritism is assessed as high, since overwhelming electoral legitimation is accompanied by a simultaneous reduction in control mechanisms.

Similarly, the institutional reforms adopted after the 2018 referendum, namely the abolition of the rotational presidency, the elimination of the three vice-presidencies, and the transfer of competencies from the Constitutional Court to an expanded Supreme Court, constitute major changes which, according to international standards (United Nations Convention against Corruption 2003; African Charter on Democracy, Elections and Governance 2007; OECD 2017), diminish decision-making plurality and weaken judicial independence. Comparative literature (Lijphart 2004; Brière 2016) demonstrates that the greater the number of veto points and the stronger the separation of powers, the lower the risk of authoritarian capture and favoritism. By removing these power-sharing and oversight mechanisms, the 2018 reforms concentrated decision-making in the hands of a strengthened executive, justifying a very high risk level in terms of administrative impartiality and equal access to public office.

Finally, indicators of public and media freedoms, such as the overall score of 42/100 assigned to the Comoros by *Freedom House* (2019) and the 56th ranking out of 180 countries by *Reporters Without Borders* (2019), confirm a shrinking civic space and a decline in media pluralism. As Kaufmann, Kraay, and Mastruzzi (2010) show in the *Worldwide Governance Indicators*, freedom of expression and public accountability play a central role in limiting opportunistic behavior by governments. When these freedoms recede, the political cost of partial appointments falls, creating a context favorable to administrative discretion and, therefore, to institutional favoritism. The risk here is assessed as high, due to the combination of political centralization and the decline of social counterweights.

The analytical framework presented in Table 2 below synthesizes these assessments by translating the empirical indicators into structural risk levels for impartiality and democratic governance in the Comoros.

Table 2 : Analytical Framework of Indicators and Risk Levels (Comoros, 2016–2019)

Domain Analyzed	Key Indicators (2016–2019)	Empirical Findings	Risk Level for Impartiality
Electoral Processes	Referendum 2018: 92.7% “Yes”; 61.6% turnout; Presidential Election 2019: 59–61%, 53% turnout	Overwhelming electoral legitimation; opposition boycott; documented arrests	High: Concentration of executive power
Institutional Reforms	Abolition of rotational presidency; elimination of vice-presidencies; transfer of Constitutional Court powers → Supreme Court	Reduced decision-making pluralism; weakened judicial oversight	Very High: Decline in separation of powers
Public Liberties & Media	Freedom House score: 42/100; RSF ranking: 56th/180	Shrinking civic space; media pressures	High: Lower political cost of partial appointments

Source: *IFES 2018; IFES 2019; Freedom House 2019; Reporters Sans Frontières 2019; International IDEA 2018; Law Library of Congress 2018.*

This analytical framework highlights a convergence of vulnerabilities: the combination of asymmetric electoral legitimation, institutional centralization, and restrictions on public freedoms creates an environment in which decisions on appointments, resource allocation, and public policy formulation largely escape democratic and judicial oversight mechanisms. In other words, the structural risk of favoritism and nepotism does not stem from isolated individual behaviors but rather from an institutional architecture that, upstream, increases its probability, in line with analyses of democratic governance and public accountability (Rothstein and Teorell 2008; Dahlström, Lapuente, and Teorell 2012; Lijphart 2004).

4. Comparative Sectoral Vignettes

The interpretation of Comorian results gains depth when contrasted with comparative experiences, particularly those of African countries that have either strengthened or, conversely, weakened mechanisms of separation of powers, administrative meritocracy, and transparency in public appointments. The governance literature consistently underlines that institutional architectures and sectoral reforms largely determine the structural probability of favoritism, even in the absence of direct nominative evidence (Rothstein and Teorell 2008; Dahlström, Lapuente, and Teorell 2012). It is therefore essential to consider a few emblematic cases to shed light, by contrast, on the institutional choices made in the Comoros between 2016 and 2019.

The case of Cape Verde is particularly instructive. Ranked among Africa's most stable democracies, this small island state established an independent electoral commission and an autonomous Constitutional Council responsible for constitutional review and electoral disputes as early as the 1990s (Ferreira 2015). According to Freedom House (2020), Cape Verde consistently scores above 90/100 in political and civil liberties, while its competitive public examination system for access to administrative positions has been cited by the Organisation for Economic Co-operation and Development (2017) as a best practice in meritocracy and in preventing clientelism. This stands in sharp contrast to the Comorian reforms of 2018, which abolished the Constitutional Court and centralized executive power, thereby underlining the importance of independent judicial review in limiting political discretion in appointments and preserving administrative transparency.

At the opposite extreme, Togo illustrates the risks of prolonged institutional centralization. As Batcho et al. (2019) have shown, repeated constitutional amendments, executive power concentration, and weak judicial oversight have, over decades, fostered a fusion of political loyalty and administrative competence, resulting in systemic favoritism within the senior civil service and state-owned enterprises. Freedom House indices (2019), ranking Togo among "Not Free" regimes, corroborate this diagnosis and confirm the close relationship between erosion of counter-powers and structural favoritism risk. This parallel illuminates the recent Comorian trajectory: the abolition of the rotational presidency and vice-presidencies in 2018 could, over time, create a similar institutional dynamic if no corrective reforms are undertaken.

A third example, Kenya, deserves attention for the reforms implemented since the 2010 Constitution. In response to decades of authoritarian centralization, Kenya adopted administrative decentralization and a public procurement reform based on digital transparency and open access to public contract data (World Bank 2018). According to Transparency International (2020), Kenya's e-procurement platform has reduced opportunities for favoritism in public contracting by imposing objective criteria and enabling civil society and media access to information on bidders, contract

amounts, and final beneficiaries. The Kenyan experience illustrates how digitization and proactive data disclosure can partly offset executive concentration by strengthening transparency and decision traceability.

Within the African island context, Mauritius provides another example of administrative meritocracy and institutional stability. The creation of an independent Public Service Commission, responsible for recruitment and disciplinary oversight in the civil service, alongside the regular publication of publicly accessible annual reports, has limited favoritism within the Mauritian administration (Mathur 2016). The independence of this Commission, guaranteed by the Mauritian Constitution and praised in the *Commonwealth Governance Handbook* (2018), contrasts with the Comorian case, where transferring the Constitutional Court's powers to the Supreme Court reduced oversight autonomy.

Finally, Ghana, often cited as an emerging democracy in Sub-Saharan Africa, demonstrates the importance of institutional pluralism in curbing nepotism. According to Gyimah-Boadi and Prempeh (2012), the presence of an active Parliament, an independent Supreme Court, and a relatively free press has enabled the exposure of several cases of favoritism in public appointments, forcing the government to adopt more transparent recruitment procedures and strengthen the role of parliamentary committees in supervising public institutions. Ghana thus illustrates the direct relationship between public liberties, separation of powers, and the limitation of institutional favoritism, a relationship that the Comoros, during 2016–2019, appears to have reversed by centralizing power and weakening counter-powers.

These comparative vignettes reveal a common lesson: states that have strengthened judicial oversight mechanisms, adopted merit-based recruitment procedures, and protected public liberties have significantly reduced the risk of favoritism and nepotism. By contrast, those that have centralized executive power and weakened counter-powers have created institutional environments favorable to partisan or personal capture of public resources. In this sense, the Comorian case, as it unfolded between 2016 and 2019, aligns more closely with the authoritarian centralization trajectories observed in Togo than with the good governance models represented by Cape Verde, Mauritius, or Ghana.

DISCUSSION AND PERSPECTIVES

1. Critical Discussion

The body of results and comparative evidence presented thus far reveals a concerning trend in the institutional evolution of the Comoros between 2016 and 2019: the combination of executive power centralization, weakening of judicial counter-powers, and reduction of democratic space has created an institutional environment structurally conducive to favoritism and nepotism, as described by international governance standards and the analytical models developed in the academic literature (Rothstein and Teorell 2008; Dahlström, Lapuente, and Teorell 2012; Lijphart 2004). Specifically, the abolition of the rotational presidency and vice-presidencies, along with the transfer of Constitutional Court powers to a Supreme Court with expanded jurisdiction, has considerably reduced decision-making pluralism and the capacity for independent oversight, both of which are essential safeguards against arbitrary appointments and the capture of public resources in other contexts.

From a normative perspective, these institutional transformations raise critical questions regarding compliance with fundamental constitutional principles such

as equal access to public office, separation of powers, and administrative subjection to general and predictable rules. As emphasized in Articles 3 and 7 of the African Charter on Democracy (2007), African states are obliged to ensure transparency, accountability, and impartiality in public administration. Yet, the Comorian reforms of 2018 clearly diverge from these standards, just as they contradict Article 7 of the United Nations Convention against Corruption (2003), which imposes explicit obligations regarding conflict-of-interest prevention and the strengthening of oversight institutions.

Cross-country comparisons reinforce this finding. Whereas states such as Cape Verde, Mauritius, and Ghana have consolidated their judicial oversight mechanisms, political pluralism, and merit-based administrative systems, the Comoros has, by contrast, weakened these mechanisms during the period under review, thus aligning more closely with authoritarian trajectories observed in Togo or the Republic of the Congo (Batcho et al. 2019). This contrast demonstrates that the structural risk of favoritism is not a fatality linked to a country's size or economic constraints but rather the result of institutional choices determining power distribution, procedural transparency, and the capacity of counter-powers to exercise effective oversight.

Theoretically, this analysis confirms the arguments advanced by Rothstein and Teorell (2008), according to which the quality of government depends not only on the regularity of elections but also on the ability of institutions to produce impartial, predictable, and rule-bound decisions. When institutions lose their autonomy and appointment processes occur beyond the reach of independent oversight, governance drifts toward what the literature calls “institutional capture”—a situation in which public resources and positions of power are allocated based on personal or partisan loyalties rather than objective and transparent criteria (Mungiu-Pippidi 2015).

Nevertheless, certain methodological limitations must be acknowledged. First, this analysis relies on aggregated indicators (Freedom House scores, RSF indices, IFES electoral data) which, while widely used in comparative research, do not always capture the full complexity of local dynamics nor intra-national variations. Second, the 2016–2019 period, though crucial, remains relatively short for assessing the long-term consequences of institutional reforms, particularly regarding whether they might eventually consolidate an authoritarian regime or allow for a democratic reopening. Third, the absence of micro-level data on individual appointments in the senior civil service or on public procurement processes limits the ability to directly quantify the extent of favoritism or nepotism, necessitating an analysis focused on structural probability rather than on measuring specific acts.

Despite these limitations, the findings suggest several reform perspectives to reduce favoritism risk and strengthen administrative impartiality in the Comoros. First, re-establishing an independent constitutional review body, akin to the Constitutional Court abolished in 2018, appears essential for restoring power balance and ensuring effective oversight of executive actions. Second, the adoption of transparent recruitment procedures in the civil service, based on open competitive examinations and the systematic publication of selection criteria, draws inspiration from best practices observed in Cape Verde and Mauritius and aligns with the Recommendations of 2017 and 2020 by the Organisation for Economic Co-operation and Development on public integrity. Third, protecting public and press freedoms remains crucial for raising the political cost of arbitrary appointments and enabling civil society to exercise critical oversight over public administration, in accordance with the principles enshrined in the African Charter on Democracy (2007) and the Convention against Corruption (2003).

In sum, the critical analysis of the 2016–2019 period in the Comoros reveals a high structural risk of favoritism and nepotism, a risk that is not inevitable but rather the product of reversible institutional choices. Reintroducing independent oversight mechanisms, ensuring transparent appointment procedures, and protecting public liberties constitute necessary conditions for restoring impartiality and accountability in the exercise of state power.

2. Limitations and Research Perspectives

At this stage, it is important to acknowledge that, despite the robustness of the data mobilized and the strength of the doctrinal framework employed, the analysis presented here remains subject to several methodological constraints that limit its scope and call for a cautious interpretation of the findings.

First, the reliance on aggregated indicators such as Freedom House scores or Reporters Without Borders rankings, while widely used in the literature on governance and democracy (Kaufmann, Kraay, and Mastruzzi 2010; Mungiu-Pippidi 2015), has the drawback of reducing the complexity of local dynamics to synthetic values that do not always reflect the diversity of practices observed at the national or subnational levels. In other words, these indices enable cross-country comparisons and situate the Comorian case within a regional or international context, but they offer only a partial picture of the concrete mechanisms of favoritism or nepotism within public administrations and political institutions.

Second, the timeframe of analysis, limited to the 2016–2019 period, though crucial given the constitutional referendum of 2018 and the early presidential election of 2019, remains relatively short for capturing the long-term effects of the reforms implemented. The literature on political transitions (O'Donnell and Schmitter 1986; Levitsky and Way 2010) shows that institutional transformations often produce delayed effects, which can only be fully assessed after several electoral cycles and in evolving socio-economic contexts. Future studies should therefore consider longitudinal analyses covering a broader period to evaluate whether the institutional centralization observed in the Comoros between 2016 and 2019 reflects a trajectory toward authoritarian consolidation or whether it has been mitigated by subsequent reforms or political and social mobilizations.

Third, the lack of micro-level data on individual appointments in the senior civil service, public procurement procedures, or budget allocations limits the ability to directly quantify the empirical extent of favoritism or nepotism. As Dahlström, Lapuente, and Teorell (2012) emphasize in their comparative work on administrative meritocracy, the fine-grained measurement of recruitment and human resource management practices in the public sector requires comprehensive datasets that remain largely unavailable for many African countries, including the Comoros. Access to such data would make it possible to move from a structural and probabilistic assessment of favoritism risk to a behavioral analysis based on direct observations and precise indicators of administrative transparency.

In addition, the approach adopted here relies on triangulation between quantitative data (electoral results, institutional indicators, public freedom indices) and qualitative sources (institutional reports, doctrinal analyses, international norms). While this method allows for the combination of heterogeneous sources and the cross-validation of different analytical dimensions, it does not substitute for ethnographic or sociological studies of local political practices, which could shed complementary light on the social, economic, and cultural logics underlying favoritism and nepotism in the

Comorian context. Fieldwork, interviews with institutional actors, and in-depth case studies would thus provide a more nuanced understanding of the motivations, networks, and strategies driving the distribution of power and resources.

Finally, the international comparisons mobilized in this research, while situating the Comorian case within the African context, would benefit from being expanded to extra-African experiences sharing similar characteristics, particularly in terms of small population size, territorial pluralism, or recent political transitions. Studies on microstates in the Caribbean or the Pacific, for example, could provide relevant comparative perspectives for analyzing the effects of political centralization and constitutional reforms on governance and administrative impartiality (Anckar 2002; Corbett and Veenendaal 2018).

These limitations thus open several avenues for future research. The development of longitudinal datasets on appointments, public procurement, and institutional reforms would enable researchers to empirically track the evolution of favoritism and nepotism over time and identify their structural determinants. The integration of qualitative fieldwork would complement statistical analysis by capturing the social and political dimensions of favoritism practices, particularly the dynamics of clientelism, personal loyalty, or communal mobilization shaping Comorian political life. A systematic comparison with other regional or extra-regional contexts would broaden the theoretical scope of the conclusions and help distinguish what stems from local specificities from what reflects broader dynamics of power centralization and counter-power weakening.

In sum, while the analysis conducted in this article provides a first rigorous assessment of the structural risk of favoritism and nepotism in the Comoros between 2016 and 2019, it calls for further research combining fine-grained quantitative data, qualitative approaches, and broader international comparisons to shed fuller light on the conditions of emergence, consolidation, or mitigation of these practices in states undergoing political transitions.

CONCLUSION

The combined body of empirical data, legal analyses, and international comparisons demonstrates that between 2016 and 2019, the constitutional and political reforms adopted in the Comoros profoundly reshaped the institutional architecture by centralizing executive power, reducing decision-making pluralism, and weakening judicial counter-powers. The simultaneous deterioration of public and media freedoms further lowered the political cost of arbitrary decisions, creating an environment in which the executive's discretionary power expanded considerably. Yet, both international good governance standards and the comparative literature demonstrate that robust institutions, transparent decision-making processes, and independent oversight mechanisms constitute essential safeguards against favoritism and nepotism. Their weakening in the Comoros therefore suggests a heightened structural vulnerability, not due to proven individual abuses, but because the institutional architecture itself has eroded the guarantees that normally constrain executive discretion.

These findings call for several normative recommendations to restore impartiality, transparency, and accountability in the governance of public affairs in the Comoros. First, it is essential to reintroduce an independent judicial oversight body, empowered to enforce constitutional compliance and to censure acts violating the

principles of separation of powers and equal access to public office. The experience of countries such as Cape Verde and Mauritius, where autonomous constitutional courts have played a decisive role in protecting fundamental freedoms and preventing authoritarian excesses, illustrates the critical importance of this mechanism (Ferreira 2015; Mathur 2016).

Second, the professionalization of the civil service through merit-based recruitment procedures, open competitive examinations, and the systematic publication of selection criteria constitutes a key condition for limiting the capture of administrative positions by partisan or familial networks. The work of Evans and Rauch (1999) and Dahlström, Lapuente, and Teorell (2012) has demonstrated that administrative meritocracy significantly reduces corruption and favoritism while improving state efficiency. Adopting these principles, as recommended by the OECD (2017, 2020) and the African Union (2007), would enable the Comoros to strengthen transparency and legitimacy in public administration.

Third, the protection of public freedoms and media pluralism remains a cornerstone of democratic governance. The literature on political accountability (Kaufmann, Kraay, and Mastruzzi 2010; Mungiu-Pippidi 2015) underscores the central role of a free press and civil society in exposing arbitrary decisions and reducing information asymmetries between rulers and citizens. Ensuring journalistic freedom, protecting civil society organizations, and guaranteeing public access to information on appointments and public procurement would increase the political cost of nepotistic practices and foster a culture of transparency and accountability.

Finally, enhanced cooperation with international partners such as the African Union, United Nations, World Bank, and OECD could facilitate the implementation of these reforms by mobilizing technical expertise, monitoring tools, and regional benchmarking mechanisms. The International IDEA's programs on constitutional governance and the OECD's public integrity frameworks offer useful normative and methodological resources for supporting institutional and administrative reforms.

In conclusion, the institutional trajectory of the Comoros between 2016 and 2019 shows that weakening counter-powers and political centralization mechanically increase the structural risk of favoritism and nepotism, but also demonstrates that this risk can be mitigated through targeted reforms aimed at restoring separation of powers, professionalizing the civil service, and protecting public freedoms. The consolidation of Comorian democracy thus requires the reconstruction of institutional safeguards that, in other African and international contexts, have proven effective in limiting the capture of public resources and promoting governance that is more transparent, impartial, and accountable.

REFERENCES

1. Abdou, A. 2015. *La rotation présidentielle aux Comores : mécanisme de stabilisation politique ?* Moroni: Presses de l'Université des Comores ("Presidential Rotation in the Comoros: A Mechanism of Political Stabilization?").
2. Azali, C. W. M. 2003. *La rotation présidentielle aux Comores : principe et pratique*. Moroni : Université des Comores (text in French; "Presidential Rotation in the Comoros: Principle and Practice").
3. Brière, F. 2016. *Judiciaire et séparation des pouvoirs en Afrique francophone* ('Judicial Power and Separation of Powers in Francophone Africa'). Paris: L'Harmattan.

4. ConstitutionNet / International IDEA. 2018. "Why Comoros' Constitutional Referendum Could Herald a New Era of Instability." *ConstitutionNet* (International IDEA).
5. Corbett, J., & Veenendaal, W. 2018. *Democracy in Small States: Persisting Against All Odds*. Oxford: Oxford University Press.
6. Dahlström, C., Lapuente, V., & Teorell, J. 2012. "The Merit of Meritocratization: Politics, Bureaucracy, and the Institutional Deterrents of Corruption." *Political Research Quarterly* 65 (3): 656–668.
7. Evans, P., & Rauch, J. 1999. "Bureaucracy and Growth: A Cross-National Analysis of the Effects of 'Weberian' State Structures on Economic Growth." *American Sociological Review* 64 (5): 748–765.
8. Evans, P., & Rauch, J. 2000. *Bureaucratic Structure and Performance in Less Developed Countries*. Berkeley: University of California Press.
9. Ferreira, M. 2015. *Institutions Politiques et Stabilité Démocratique au Cap-Vert* ('Political Institutions and Democratic Stability in Cape Verde'). Praia: Universidade de Cabo Verde Press.
10. Freedom House. 2019. *Freedom in the World 2019: Comoros*. Washington, DC: Freedom House.
11. Gyimah-Boadi, E., & Prempeh, H. 2012. "Preventing Democratic Backsliding in Africa." *Journal of Democracy* 23 (3): 51–62.
12. IFES. 2018. *Election Guide: Comoros Constitutional Referendum, 30 July 2018*. Washington, DC: International Foundation for Electoral Systems.
13. IFES. 2019. *Election Guide: Comoros Presidential Election, 24 March 2019*. Washington, DC: International Foundation for Electoral Systems.
14. Ijichi, N., & Zélia, A. 2017. "Consociational Mechanisms in Archipelagic States: The Case of the Comoros." *African Journal of Political Science* 12 (3): 45–67.
15. Kaufmann, D., Kraay, A., & Mastruzzi, M. 2010. "The Worldwide Governance Indicators: Methodology and Analytical Issues." *World Bank Policy Research Working Paper* No. 5430.
16. Law Library of Congress. 2018. "Comoros: Planned Constitutional Referendum on Presidential Term Limits Leads to Crisis." *Global Legal Monitor*, 30 July 2018.
17. Levitsky, S., & Way, L. 2010. *Competitive Authoritarianism: Hybrid Regimes after the Cold War*. Cambridge: Cambridge University Press.
18. Lijphart, A. 1977. *Democracy in Plural Societies: A Comparative Exploration*. New Haven, CT: Yale University Press.
19. Lijphart, A. 2004. "Constitutional Design for Divided Societies." *Journal of Democracy* 15 (2): 96–109.
20. Mathur, A. 2016. *Public Service Commissions and Good Governance: The Case of Mauritius*. Port Louis: University of Mauritius Press.
21. Mefteh, A., & Bino, K. 2019. *Justice constitutionnelle et gouvernance politique aux Comores*. Moroni : Université de Moroni ("Constitutional Justice and Political Governance in the Comoros").
22. Mungiu-Pippidi, A. 2015. *The Quest for Good Governance: How Societies Develop Control of Corruption*. Cambridge: Cambridge University Press.
23. O'Donnell, G., & Schmitter, P. 1986. *Transitions from Authoritarian Rule: Tentative Conclusions about Uncertain Democracies*. Baltimore: Johns Hopkins University Press.
24. OECD. 2017. *Recommendation on Public Integrity*. Paris: Organisation for Economic Co-operation and Development.
25. OECD. 2020. *Public Integrity Handbook*. Paris: Organisation for Economic Co-operation and Development.
26. Rabarijohn, M. 2012. *L'État comorien et ses institutions : entre consociation et centralisation*. Moroni : Presses nationales ("The Comorian State and Its Institutions: Between Consociationalism and Centralization").
27. Reporters Sans Frontières (RSF). 2019. *World Press Freedom Index 2019: Comoros*. Paris: RSF.
28. Rothstein, B., & Teorell, J. 2008. "What is Quality of Government? A Theory of Impartial Institutions." *Governance* 21 (2): 165–190.
29. Sadiki, L. 2014. *Rethinking Democratization in the Arab World*. Oxford: Oxford University Press.

30. Transparency International. 2016. *Preventing Policy Capture: Integrity and Transparency in Decision-Making*. Berlin: Transparency International.
31. United Nations Office on Drugs and Crime (UNODC). 2003. *United Nations Convention against Corruption* (UNCAC). New York: United Nations.
32. World Bank. 2018. *Kenya Open Data Initiative: Public Procurement Reforms*. Washington, DC: World Bank.
33. African Union (AU). 2007. *African Charter on Democracy, Elections and Governance (ACDEG)*, adopted in Addis Ababa on 30 January 2007, entered into force on 15 February 2012.
34. Court of Cassation of Senegal. 2010. *Arrêt du 12 mars 2010 sur le principe d'interdiction de l'arbitraire en droit administratif sénégalais* ("Decision of 12 March 2010 on the Principle of Prohibition of Arbitrariness in Senegalese Administrative Law"). Dakar: Court of Cassation of Senegal.
35. Union of the Comoros. 2018. *Constitution of the Union of the Comoros, adopted by referendum on 30 July 2018, entered into force on 7 August 2018* ("Official text in French; author's translation"). Moroni: Government of the Union of the Comoros.
36. United Nations (UN). 2003. *United Nations Convention against Corruption* (UNCAC), adopted in New York on 31 October 2003, entered into force on 14 December 2005.