

The crime of the subsequent reward as one of the forms of administrative corruption An analytical study of the modified Saudi anti-bribery law on 11/04/1443 AH

Dr. Islam Mahrous Ali Naggi

Assistant Professor of public Criminal Law, Department of Public law
Collage of Law

Princess Nourahbint Abdulrahman University

Riyadh, Saudi Arabia

imnaggi@pnu.edu.sa

imnaggi@gmail.com

Abstract:

The crime of the subsequent reward represents one of the forms of functional deviation of the employee in performing his work from the intended purpose of this performance, which is the public interest, in order to achieve personal interests represented in enrichment or illegal gain, In view of the seriousness of this crime and its profound impact on the proper progress of the public interest, the spread of the phenomenon of employees accepting presents and gifts after performing their duties from the stakeholder considering them as a form of courtesy and the subsequent reward for their job duties despite the organizer's criminalization of this behavior, the researcher studied this crime in order to spread legal awareness about this crime as well as to determine the extent of the adequacy of the organizer's treatment of this crime in terms of its elements, the prescribed penalty and the conditions for its implementation.

Keywords: bribery - subsequent reward - public employee - government employee - administrative corruption - career deviation.

Introduction:

The Saudi law has adopted the trend that aims to criminalize the subsequent reward offered by the stakeholder to the public employee for completing the work, abstaining from, or violating the duties of the job. Rather, it considered the subsequent reward as a form of bribery and determined the penalty prescribed for bribery after considering the employee who receives the reward for what he did even without a previous agreement, as a briber and punished with the penalties prescribed for the crime of bribery in its normal form.

The problem of the study:

Due to the great economic progress witnessed by the Kingdom, the of forms of bribery made by employees and stakeholders developed and varied which led to the destruction of debts that are no longer able to face the temptation of money and its domination over the souls of the weak. Therefore, there was an urgent need to study one of the most important forms of the implementation of bribery crimes in the light of the legislative amendment issued on 27/04/1443 AH to determine the extent of the sufficiency of the scope of criminal protection for this type of crime and the penalty prescribed for the crime of the subsequent reward as one of the crimes affecting the public interest of the state in view of the continuous increase in the statistics of crimes of this kind.

Methodology:

The researcher used the analytical method for the purposes of analyzing and studying the legal texts and provisions and concluding the forms of the crime's execution, its pillars, ways to prove it, and the penalty prescribed for the offender in this regard.

Literature review:

The crime of the subsequent reward is one of the crimes attached to the crime of bribery in the Saudi law. The basis of the criminalization in it lies in the public employee's bad use of his position. The crime of the subsequent reward is based on an assumed element which is the attribute of the perpetrator and the material and moral element. The researcher will study the elements of the crime as mentioned hereinafter.

The presumed element: the capacity of the perpetrator in the crime:

The crime of the subsequent reward presumes that the briber is a public official or one of those who are considered to be in his position and specialized in the required work, whether full or partial competence or that who claims to be competent. This capacity is a presumed element for the occurrence of the subsequent reward crime.

The first and second articles have illustrated the capacity of the bribe-taker. The eighth article determines the employees to whom the capacity of a public official applies as follows:

1. A person who works for the state or for an agency with a public legal capacity, whether on a permanent or temporary basis.
2. The arbitrator or expert appointed by the government or any body having judicial jurisdiction
3. A person assigned by a government agency or any other administrative authority to perform a specific task.
4. Anyone who works for companies or individual institutions that manage, operate or maintain public utilities, or perform a public service in addition to those who work for joint stock companies, companies in which the government contributes in their capital, and companies or individual institutions that engage in banking business.
5. The chairmen and members of the boards of directors of the companies stipulated in the fourth paragraph of this article.
6. Employees and members of civil assemblies of public interest, chairmen and members of their boards of directors.
7. Employees, institutions and international organizations in connection with the conduct of international business.

Second: The material element:

This crime was stipulated in article three of the law by saying: “An employee who asks for himself or for others or accepts or takes a promise or gives it to breach the duties of his job or to reward him for what he did even if this occurred without a previous agreement is considered a bribe-taker and must be punished by the penalty stipulated in Article 1 of this Law).

It is clear from this text that the law considered the subsequent reward as a form of bribery and is punishable by the penalties prescribed for the crime of bribery itself, so the subsequent bribery is equal to the previous bribery. In addition, if there is a difference between the two cases that is represented in the absence of the idea of trafficking in the public office in the event of subsequent bribery because trafficking requires doing the work, refraining, or breaching in return for what the briber receives so that the consideration is the price of doing the job duties. This trafficking does not exist in the form of a subsequent reward where the employee performs his work in a way that achieves the desired interest of the person in need. Then he is requested to give a reward for that, or the person in need of his own offers this reward in recognition of the employee's thanks to the employee who accepts it even if there was no prior agreement between them on this matter (Khader; 2001).

Accordingly, the subsequent reward does not presuppose any prior agreement between the employee and the stakeholder because the existence of this agreement leads to the normal bribery even if its implementation depends on the performance of the work or abstention. The request, acceptance or capturing was not prior to or contemporaneous with the employee's implementation of the work, rather it occurred after the completion of this work (Al-Hadithy; 2016). Accordingly we will study the behavior patterns of the crime as follows: -

The first form: In this form, the employee agrees with the stakeholder to work, refrain, or breach without an agreement in return for that. After the employee has done what was agreed upon, he requests, accepts, or takes a gift or a promise to reward him for what he has done. In this case, there will be an agreement to work, abstain or breach without compensation, otherwise the normal form of bribery stipulated in above. The agreement on a specific amount does not exist in advance, but was submitted in the form of a reward for the employee's implementation of the agreement to work, abstain or breach (Abdel-Al; 2015).

The second form: In this form, no agreement occurs whether with regard to the work required of the employee or in relation to the consideration. In this case, the employee performs the work in violation of the duties of the job. Then he asks the stakeholder for a gift or a promise as a reward for what he did, or accepts or takes what is submitted to him for this purpose (Al-Alfi; 1988).

The third form: The employee, in this form, performs one of the duties of his job in a proper manner and without any violation of the duties of the job. Then, he gets a reward from the person concerned for doing his job and accepts it (Abdel-Al; 2015).

Hence, had it not been for the explicit text in the law, it would not be possible to punish the employee in the form of the subsequent reward. Considering it as an independent form of bribery is what makes

the employee's punishment possible if his request, acceptance or taking in return for the reward is after doing the work. The law has done well by stipulating this form of the subsequent bribery because it degrades the dignity of the public job and the person responsible for it. It may obligate him later to trade in the job if it becomes clear to him that the job can be a means of quick enrichment. The text related to this form prevents circumvention of the bribery texts by postponing the request, accepting or taking the gift or return until the work is done so that there is no contemplation between these matters and performing the job duty. The texts of the crime of bribery cannot be applied to the employee, so the law stipulated that the crime, whether the employee requested, accepted, or taken before performing the work or breaching or after it, even if it was without any previous agreement (Al-Shazly; 2022).

Third: The moral element:

The crime of subsequent reward is an intentional crime. Therefore, its moral element takes the form of criminal intent. It is presumed that the accused knows that he is a real public official or an official that is specialized in the work he has done. Furthermore, he must be aware that what is submitted to him is a reward from the stakeholder for the work he has done in appreciation and gratitude to him.

When the public servant takes this remuneration or accepts a promise or request for it, the criminal intent is negated if he was aware of that as if the stakeholder provided the employee with money after performing the work and the employee took it thinking that he had paid a part of a debt owed by the person in need while the latter had offered it as a reward for this employee.

The criminal intent is also negated, and the crime does not occur if the will to demand, accept, or take is negated or if it is not a free will in application of the general rules. An example of this is that the employee takes the subsequent reward under duress pressure or the necessity of resorting to taking it (Al-Shazly; 2022).

It does not mean that the intent is based on the motives that prompted the employee to request, accept or take the reward. It is not important if the employees requested, accepted or taken the reward for himself or for others, he changed the law between the two cases. (Hosni; 1998).

Fourth: Penalty of the crime

The law sets penalties for the subsequent reward crime with an original penalty, which is the same as prescribed for the crime of bribery, i.e. imprisonment for a period not exceeding ten years and a fine of no more than one million riyals, or one of these two penalties. The employee, who requests, accepts or takes the gift as a reward as a principal perpetrator in this crime, which is considered one of the crimes of the public servant, deserves this punishment. The person who offers the reward as an accomplice in the crime is also entitled to this penalty, and he will be punished with the same penalty in application of the text of Article 10 of the law.

In addition to the original penalty, a complementary penalty will be imposed, which is the confiscation of the money or gift that was presented as a reward to the employee.

The judgment of the principal penalty entails the application of the consequential penalty stipulated in Article thirteen of the law

The subsequent bribery, like the previous bribery, is only carried out in full and there are not any attempts in this type of crimes because merely asking for a reward is sufficient for the crime to be completed in full even though the stakeholder does not respond to that. If the stakeholder offers a reward and the employee rejects it, the crime of offering bribery will be considered existing because the subsequent reward is a form of bribery. The law considered the employee in the event of a subsequent reward a bribe taker, so whoever is offered the reward is considered a briber. The law did not differentiate in relation to the offer of a bribe that was not accepted between its previous offer to do the work and its subsequent offer to that (Hosni; 1998).

The law considered the employee who requests or accepts the subsequent bribery as a bribe taker employee and the one who offered him the reward is a briber as well. Therefore, we think that the briber or the mediator in the subsequent reward crime deserves to be exempted from the penalty if he informs the authorities of the crime before it is detected. Article 16 of the law does not differentiate with regard to the exemption between the previous bribery and the subsequent bribery on one hand. On the other hand, reporting the crime of a subsequent reward is provided by the informer as a service to the society and he deserves a reward for by exempting him from the penalty prescribed for the crime which is represented in detecting the briber employee who is not satisfied with the salary that the state delivers him in return for fulfilling the interests of people, but rather he asks, accepts or takes a reward from them for carrying out the duties of his job or a reward for his breach of the duties of the job (Khidir; 2001).

Fifth: The objective provisions of the subsequent crime of bribery:

These provisions relate to participation in bribery crimes, ancillary and complementary penalties, exemption from punishment, and rewarding those who lead to one of the crimes stipulated in the anti-bribery law.

1.1 Participation in the crime:

The punishment of the accomplice in the bribery is stipulated in Article 10 of the law, which stipulates the punishment of the briber, the mediator and anyone who participates in one of the crimes mentioned in this law with the penalty stipulated in the article criminalizing it. Whoever agrees, abets, or assists in the commission of the crime with his knowledge of that, whenever the crime is committed on the basis of this agreement, incitement or assistance, will be considered accomplice in the crime.

This text is only an application of the general rules in criminal participation as it determines the forms of participation and the conditions that must be met to hold the accomplice accountable for the crime the most important of which is the occurrence of the crime in accordance with agreement, incitement or assistance, i.e. the presence of a causal link between participation and the crime that actually occurred and the criminal intent of the accomplice, i.e. knowledge and willingness to participate in the crime (Namour; 2002)

However, the punishment of the accomplice does not require that the original perpetrator is punished. The failure to punish the original perpetrator does not affect the obligation to punish the accused (the accomplice) in accordance with the legal rule which states that the perpetrator of the crime is not punished for one of the reasons for its permissibility or for the absence of the element of criminal intent or for special circumstances..., this does not preclude the punishment of the accomplice.

The accomplice in one of the stipulated crimes will be punished with the same penalties prescribed for the original perpetrator of the crime, whether that includes the original penalties or the accessory and complementary penalties

In this regard, the law took the view that the rule of non-compromise between the punishment of the perpetrator and the accomplice is limited to hudud and retribution crimes. It does not apply to punitive crimes for which it is possible to compromise between the punishment of the original perpetrator and the punishment of the accomplice

It applies to participation in the bribery in terms of its conditions, the effect of abandoning it, the effect of the perpetrator's circumstances on the accomplices, the effect of the circumstances of the accomplices among them and the accomplice's responsibility

In the event that the perpetrator commits a crime other than the one in which he deliberately participated, the rules that apply to participation in general are established by Islamic jurisprudence (Al-Shazly; 2022).

1.2 Ancillary and Complementary Penalties:

Ancillary penalties: Article thirteen of the Law stipulates the complementary. These penalties are inevitably applicable and by force of the law without the need to stipulate them in the decision of the judging panel issued to convict the accused and apply the original penalty because the complementary penalties result from the issuance of a judgment of conviction in one of the crimes stipulated in the anti-bribery law.

We have noticed that the law, in order not to perpetuate the complementary penalty, allowed the Council of Ministers to reconsider it after five years have passed from the date of completion of the implementation of the original penalty.

Therefore, in order for the complementary penalty to be reconsidered, two conditions must be met:

First: The convict has completed the execution of the original penalty. If it was not carried out for any reason, such as the convict escaping from execution, it is not permissible to reconsider the complementary penalty (Amer; 1976).

Second: Five years have elapsed from the date of completion of the original penalty, if the convict has actually executed it, this period is considered a full time period that must elapse. In order to be able to take the required action, this is to submit a request from the convict to reconsider the accessory penalty.

However, if the convicted person's application is rejected because the legally prescribed period has not elapsed due to the possibility of submitting it, the convicted person may submit a new application after the expiry of the period.

The rule is that pardoning the principal penalty or not applying it does not entail pardoning the consequential penalty unless the law decides otherwise (Namour; 2002).

As for the complementary penalty, it is stipulated in Article 15 of the law and is represented in the ruling to confiscate the money, advantage, or interest that is the subject of the crime, whenever that is possible in practice. This penalty is obligatory. The judge's obligation to make his decisions (Najm; 2018) It will not be applied if the text of it is neglected in the ruling conviction and the confiscation penalty will be imposed even if the briber is exempted from the penalty of the original crime.

since the confiscated money represents the subject of the crime, it is not permissible to demand its return, and this is what is learned. The concept of violation from the text on exempting the briber or mediator from punishment in the Saudi law (Hosni; 1998).

1.3 Exemption from punishment:

Article sixteen of the law stipulates a reason for exemption from punishment by deciding to exempt (the briber or mediator from the original and dependent penalty if he informs the authorities of the crime before it is detected).

The exemption is limited to the briber or the mediator in any of the crimes stipulated by the law. The exemption is limited to the original and complementary penalty, in the express text, and does not include the complementary penalty.

1.4 Reward for someone who leads to a crime of bribery:

In addition to exempting the briber or mediator from punishment if he informs the authorities of the crime before it is detected, This is a reward for them for a service they render to the community

The law decided in Article 17 of it a financial reward of no less than five thousand riyals and not more than half the value of the confiscated money for anyone who leads to one of the crimes stipulated in the anti-bribery law.

The text of Article 17 of the law is as follows:

(Anyone who guides to one of the crimes stipulated in the law and whose information leads to the crime being proven, and is not a briber, accomplice or mediator is given a reward of not less than five thousand riyals and not more than half the value of the confiscated money will be granted. The reward will be estimated by the party that judges the crime

The Ministry of Interior may disburse remuneration higher than the amount determined pursuant to this article, after the approval of the Prime Minister.

It is clear from this text that several conditions are required to be eligible for the reward decided by the law for those who uncover a crime of bribery. These conditions are summarized as follows:

First: The person reporting the bribery must not be an accomplice, briber, or mediator. If he is one of these, the law will exempt him from punishment if he reports the crime.

Moreover, he is not entitled to a financial reward, and as a matter of fact, the bribery employee who reports the bribery after its completion is not entitled to that reward.

Second: The information of the informant lead to the establishment of the crime and that the notification is detailed, conforming to the truth and supported by sufficient evidence. The law intended with this condition to avoid malicious reports against employees or cases of artificial bribery, which is intended for the amount merely to obtain a lucrative financial reward (Al-Shazly; 2022;)

Third: The informant should not be from the public authority, because the job of these people is to discover and report crimes, including bribery. This condition is not stipulated in Article 17 of the law that established this reward.

Nevertheless, the nature of the work of the public authority men requires it and saying otherwise leads to fabricating and reporting cases of bribery from the men of the authority in the hope of a tempting reward (Khafaji; 1957). The application of Article 15 of the previous anti-bribery law at work has already revealed this it's up

Therefore, the matter was presented to the Council of Ministers, and it decided on 8-9/11/1388 AH (Resolution No. 1398) to refer the Advisory Division's memorandum No. 376 on 1/7/1388 AH, which examined this subject to the committee formed to reconsider some texts of the law of anti-bribery.

The advisors' memorandum in this regard stated the following: (The reward referred to in the anti-bribery law is for non-men of authority, as the discovery of crimes, including the crime of bribery, is one of their most important duties.

In addition, the opposite leads to fabricating bribery crimes with the intention of obtaining a reward.

It may be said that the text of Article 15 is absolutely in the following manner - everyone who is instructed to commit a crime - so that it includes the man of authority and others and responds to that that the one who guides to the crime is the man of authority to take the following measures (Al-Ani; 2011)

It is not conceivable that the text meant a person whose duty was to discover the crime, so he encouraged someone other than the policeman to advise on the crime of bribery by giving him a reward.

The memorandum recommended that the subject is submitted to the committee formed to amend the texts of the anti-bribery law. It suggested either excluding authority men from the number of people who receive the reward or canceling the minimum set for it because its increase tempts some to fabricate bribery crimes in the hope of reward (Al-Ketbi; 2020).

If the previous conditions are met, the informer will be entitled for the financial reward set by the law, and obligatorily granted the reward. The entity competent in ruling in bribery crimes cannot reject it. Article 17 determined the amount of the reward between two minimum and maximum limits. The minimum is five thousand riyals and the maximum is half of the confiscated money. If the confiscated money is less than ten thousand riyals, that is, if half of it is not sufficient to pay the minimum reward, which is five thousand riyals, the state treasury will bear the difference between half of the confiscated money and the sum of five thousand riyals.

However, if the confiscation was not ruled at all, the remuneration is paid in full from the state treasury. Also, Article 17 of the law introduced a new provision allowing the Ministry of Interior to pay remuneration that exceeds the amount determined by this article after obtaining the approval of the Prime Minister on this extra reward. It is obvious that the increase in the specified reward does not require a decision from the authority that judges a crime.

1.5 Toughening the punishment in the event of recidivism:

The new anti-bribery law introduced a text to toughen the punishment for the crimes stipulated in it because of recidivism. Article 18 of the law states that:

(A person will be considered a recidivist from a judgment convicting him of one of the crimes stipulated in this Law if it is proven that he committed another crime in accordance with its provisions before the lapse of five years from the date of expiry of the penalty. In this case, he may be sentenced to more than the maximum penalty prescribed for the crime provided that the penalty does not exceed double this limit).

Recidivism is an emphatic circumstance for punishment that applies to all crimes but due to the absence of a general text in the Saudi law that deals with the subject of the recidivism, each law places the text related to recidivism at the core of the law if it wishes to tighten the punishment because of the recidivism (Khafaji; 1957).

Recidivism occurs when a person commits a crime after being sentenced to a penalty for a previous crime or crimes. Recidivism presupposes the multiplicity of a person's crimes if there is

a final and definitive ruling between the crime and the crime that follows. Recidivism differs from the multiplicity of crimes as it requires the necessity of separating these crimes by a final judgment with a penalty. On the other hand, the multiplicity of crimes necessitates that a person commits several crimes for which he is brought to trial and in which a single judgment of conviction is issued (Amer; 1976).

The law considered whoever commits another crime of the crimes stipulated in the law within the five years following the date of the expiry of the sentence imposed for the previous crime as a repetition of the same crime that requires severe penalty as stipulated in Article Eighteen (Khalidi; 2020).

Conditions of recidivism:

The following are required to fulfill the condition of recidivism stipulated in the law:

A ruling has been issued convicting the accused of one of the crimes stipulated in the Anti-bribery Law by the authority competent with ruling in bribery crimes in the Kingdom. It is equal if the condemned person is the briber, the briber or the mediator (Haha; 2016).

The conviction verdict was made by one of the original penalties, which are imprisonment and a fine. If the accused person is exempted from the original penalty, the judgment issued previously against him will not be valid in recidivism.

The convicted person has committed a new crime stipulated in the Anti-bribery Law and not any other crime. Thus, the law has considered the special recidivism that requires that the new crime is similar to the first crime in fact or judgment; namely, the same as the first crime (real similarity) or unites with it in the right of the infringed (peremptory similarity) and consider the general recidivism that does not require similarity between the first crime and the second crime.

The convicted person committed the new crime before the lapse of five years from the date of the expiry of the original penalty imposed for the previous crime. Thus, the law has made the recidivism temporary and not permanent. The temporary recidivism, to be available, requires that the new crime occurs within a specific period calculated from the date of the previous ruling or the date of the expiry of the original penalty imposed by this ruling. The law requires that the convicted person has committed the other crime before the lapse of five years from the date of the expiry of the imposed sentence (Dhaif Allah; 2016).

1.6 Publication of judgments:

Article 21 of the new anti-bribery law decided that judgments issued in the crimes stipulated in the law must be published. The text of the article is as follows: "The Ministry of Interior must publish and announce the rulings issued in bribery crimes."

In fact, the publication of rulings if convictions for a crime may be a complementary penalty that the governing body rules in bribery cases. It may be an accessory penalty stipulated by the law and therefore it is applied without the need for judgment (Jerada; 2018).

The anti-bribery law has adopted an accessory penalty that results from the conviction and publication carried out by the Ministry of the Interior. The publication stresses upon the utterance of the verdict of conviction and the imposed sentence. In addition, it is published in a daily newspaper. It is assumed that it is made at the expense of the convicted person. The law does not only publish the rulings issued in bribery crimes, but rather it added and announced them. The purpose may be to announce the ruling in the employee's workplace as a guarantee of public deterrence or in public places, in the audio-visual media or on social networks (Farraq; 2011).

Conclusion

- 1- The crime of bribery is one of the most important crimes against the public interest of the state, so the Saudi regulator seeks to cover all forms of real and legal bribery with criminalization including the crime of subsequent bribery
- 2- The organizer explicitly deals with the forms of the subsequent reward crime and considers it as one of the crimes of true bribery.
- 3- The bribed employee does not benefit from exemption by punishment according to the Saudi law while the briber deserves to be exempted from punishment if he informs the authorities of the crime before it is detected.

- 4- The accomplice in the crime of subsequent bribery will be punished with the same penalties prescribed for the original perpetrator of the crime including the original penalties or the ancillary and complementary penalties.
- 5- There is a need to exert more efforts to spread awareness of the real and legal crime of bribery that is criminalized in Saudi legislation.
- 6- We propose to reward the employee who resists the material or moral temptation of stakeholders. Therefore, it will be appropriate to financially reward this employee if his integrity is proven by a material fact represented in rejecting bribery. It is also necessary to morally encourage him by an exceptional promotion to a higher rank for which he has the competence to perform his duties.
- 7- We also suggest motivating employees who reject bribery of all forms by announcing their honor by means that ensure that people are aware of their behavior, honesty and integrity. Whereas Article 16 of the previous anti-bribery law stipulated that the employee who refuses the bribery will be financially rewarded and exceptionally promoted if he repeatedly refuses the bribery. However, the current law does not contain this text because the law of financial rewards and exceptional promotions does not belong to the anti-bribery law, but rather the civil service law that regulates personnel affairs.
- 8- We also suggest publishing verdicts of acquittal as Article 21 states that the verdicts issued in bribery crimes are published and does not specify them with conviction rulings. Hence, the article does not specify the reason for publication, whether the publication of convictions rulings, innocence, or exemption from penalty.
- 9- Furthermore, we suggest exempting the briber from the penalty of confiscation in order to encourage him to report the crime of bribery. The ruling of confiscation must be issued in each case in which it is practically possible.

References

- 1- Fakhri Al-Hadithi (2016), Explanation of the Penal Code, Special Section, Crimes against Persons - House of Culture for Publishing and Distribution, Amman.
- 2- Osama Attia Muhammad Abdel-Aal (2015), Explanation of the General Rules of Criminal Law, first edition - Al-Rushd Library Publishers, Kingdom of Saudi Arabia.
- 3- Tarek Fathy Sorour (2003), Penal Code, Special Section - Edition 1, Dar Al-Nahda Al-Arabiya, Cairo.
- 4- Ahmed Abdulaziz Al-Alfi (1988), Explanation of the Penal Code - General Section, Zagazig University, Egypt.
- 5- Mahmoud Naguib Hosny (1988), Special Section - Edition 1, Dar Al-Nahda Al-Arabiya, Cairo.
- 6- Fattouh Abdullah Al-Shazly (2002), Organized Punishment Crimes in the Kingdom of Saudi Arabia
- 7- Ahmed Refaat Khafagy (1957), Bribery Crimes in Egyptian Legislation and Comparative Law - Egyptian Renaissance Library.
- 8- Mamoun Salama (2019), Explanation of the Penal Code, Special Section, Arab Thought House
- 9- Abdul Aziz Amer (1976), Al-Tazir in Islamic Sharia, Cairo, Arab Thought House
- 10- Abdul Fattah Khader (2001), Punishment and Contemporary Criminal Attitudes, Riyadh, Institute of Public Administration.
- 11- Muhammad Saeed Nammour (2002), Penal Code, Special Section, Crimes against Persons - Volume 1 - International Scientific Publishing House, Amman.
- 12- Muhammad Subhi Najm (2018), Explanation of the Penal Code - Special Section, House of Culture, Amman - Jordan
- 13- Muhammad Shallal Al-Ani (2011), Provisions of the General Section in the Federal Penal Code, General Theory of Crime, Bright Horizons - Sharjah - United Arab Emirates, Edition 1
- 14- Abdullah Salem Hamouda Al Ketbi and others (2020), the crime of bribery, a comparative study between the provisions of Islamic Sharia and the Anti-Corruption Agreement - University of Sharjah, United Arab Emirates.
- 15- AbdulAaliHaha (2016), Strategy of the Algerian legislator in combating corruption, research published in the Journal of Rights and Freedoms, University of Biskra - Issue 2, Algeria.
- 16- Saleh Ahmed Dhaif Allah (2016), Crime of Bribery in the Kingdom of Saudi Arabia - Research published in the Journal of Sharia Sciences, Qassim University - Issue 3, Volume 9.
- 17- Abdul Qader Saber Jarada (2018), Objective provisions of the crime of bribery, a research published in a University Journal for Human Sciences enrichment - Palestine, Fourth issue.
- 18- Muammar Fergag (2011), Bribery in the Anti-Corruption Law, a published research, Issue 9, Academy Journal of Social and Human Studies - HassibaBou Ali University, Algeria.

- 19-** Sharifa Khaldi (2020), Crime of Bribery in Public Characteristics - Journal of Human Sciences, Al Arabi Al Tebssi University - Issue 15, Algeria