

Regulating Online Speech in Malaysia Playing the Devil's Advocate on the Fake News Law Dichotomy

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Abstract: On 2 April 2018, the Malaysian House of Representative passed the Anti-Fake News Act 2018 ('AFNA 2018'). The former Law Minister emphasised that the objective of the legislation is to protect the public from the proliferation of fake news. On the contrary, advocates of human rights criticise that the new law is extremely vague and disrespectful of the right to freedom of speech. Thus, the fake news legislation creates a dichotomy between maintaining public order and nurturing the fundamental rights of the citizen in a democratic society. This paper argues that regulating online speech in Malaysia under the AFNA 2018 scheme still raises concerns with regard to the infringement of the right to freedom of speech and requires the urgent attention from the relevant authorities. This paper aims to critically examine the normative aspects of the AFNA 2018 and other relevant legislation addressing false content. This paper commences with a constitutional review of the AFNA 2018. It continues to discuss other existing laws. This paper concludes that AFNA 2018 contains a number of flaws that does not promote ones' constitutional right to freedom of speech. This paper employs a qualitative and doctrinal research method through content analysis approach.

1 INTRODUCTION

Malaysian political landscape has transformed since the introduction of the Anti-Fake News Act 2018 (hereinafter 'the AFNA 2018'). Since Malaysia's independence in 1957, the old regime has been in power for 61 years by one political coalition, the National Front ('Barisan Nasional' or hereinafter 'the BN'). The BN is said to maintain its hegemony through authoritarian actions including incumbent-favoured gerrymandering and media dominance (Ueda, 2018). It is under this former reign the AFNA 2018 was enacted. The new government historic victory during the 14th general election promises better Malaysia and Malaysian with the hope of upholding the rights of the people, particularly the freedom of speech and expression. It is no surprise that this promise leads to a proposed legislative measure to repeal the AFNA 2018 (Bernama, 2018).

Prior to the enforcement of the AFNA 2018, few existing laws have been applied to regulate issues related to online and offline fake content. Although some may argue about the lacking aspects of the latter legislation, the instrumental considerations in the ineffectiveness of the current laws to control false content has not been empirically highlighted. The

passing of the AFNA 2018 marked a more stringent approach on fake contents. Ironically, the enforcement of the AFNA 2018 has taken place a month before the 14th Malaysian general election on 9 May 2018. Critics proposed that the primary aim of the AFNA 2018 is to silence any criticism of the ruling government and the related issues including the 1MDB crisis (Hutt, 2018). In addition, human rights activists have raised concern on the breach of the right to freedom of speech and expression under the fake law regime (Hutt, 2018; Human Rights Watch, 2018; Sipalan, Menon & Birsal, 2018).

The objective of the study is to critically analyse the normative aspects of the AFNA 2018 and current laws in relation to false content. This paper explains the constitutional position of the freedom of speech and expression in Malaysia. This paper also examines the statutory limitations of the right in light of the AFNA 2018, the Communications and Multimedia Act 1998, the Printing Presses and Publications Act 1984 and the Penal Code. This paper concludes that AFNA 2018 contains a number of flaws that does not promote ones' constitutional right to freedom of speech.

2 MATERIALS AND METHODS

This paper employs a qualitative and doctrinal research method through content analysis approach where the normative facets of the AFNA 2018 and other legislation are examined. It comprises of primary and secondary sources through the library-based research. Whilst the first encompasses of Malaysian legislation, policies and judicial decisions, the latter constitutes a significant proportion of online databases content including LexisNexis, Westlaw and others.

The existing laws prior to the introduction the AFNA 2018 are briefly discussed with emphasis on the applicability of the laws to control fake content. The authors acknowledge that the Defamation Act 1957 also impliedly addresses the issue of fake news but due to the constraint, the Defamation Act 1957 will not be discussed in this paper.

3 RESULT AND DISCUSSION

3.1 Freedom of Speech and Expression

The international recognition of the right to freedom of speech and expression is manifested in the Universal Declaration of Human Rights (hereinafter 'the UDHR'). Malaysia is a signatory to the first global expression of human rights, on a limited scale. This is reflected in light of Section 4(4) of the Human Rights Commission of Malaysia Act 1999 that regard shall be had to the UDHR to the extent that it is not inconsistent with the Malaysian Federal Constitution. Article 19 of the UDHR lays down the following provision:

Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers;

The phrase 'freedom to hold opinions without interference' does not connote an absolute right to freedom of speech and expression at the international level. This is due to the conditions stated under Article 29 of the UDHR in order to impose any limitations on the right to free speech. Article 29 of the UDHR highlights the following aspects:

...everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition & respect for the rights & freedoms of others & of meeting the just requirements of morality, public order & the general welfare in a democratic society..

Any restraints must fulfil a three-part test, approved by the United Nation Human Rights Committee (Human Rights Committee, 2011). The conditions of the test are first, the restriction must be provided by law, which is clear and accessible to everyone. This requirement highlights the principle of legal certainty, predictability and transparency in order to prevent arbitrariness by the relevant authority. Second, the limitation must fulfil one of the purposes set out in Article 19(3) of the International Covenant on Civil and Political Rights (hereinafter 'the ICCPR'). The ICCPR (1966) underlines the premise to protect the rights, reputations of others, to protect national security, public order or public health or moral and the principle of legitimacy. Third, the restraint must be proven necessary and restrictive means which are needed. The restraint must also correspond with the purpose in light of the principle of necessity and proportionality. The term 'necessary' must demonstrate a pressing social need and protect legitimate interests (Human Rights Committee, 2011).

The Malaysian position of the right to freedom of speech and expression is enshrined in Article 10(1) of the Federal Constitution as follow:

subject to clauses (2),(3) & (4) every citizen has the right to freedom of speech and expression

Similar to the international approach, the freedom is not absolute and the limitations are provided under Articles 10(2)(a) and 10(4) of the Federal Constitution. Articles 149 and 150 of the Federal Constitution also authorise restriction on free speech on the grounds of subversion and emergency situations. However, the above mentioned Malaysian limitations under the Federal Constitution are slightly differed from the international measures in terms of the requirements and principles that have been emphasised. The requisite standard of 'necessity' aiming to safeguard a legitimate public interest with a pressing social need are not clearly embedded in the drafting of the legal mechanism to restrict free speech in Malaysia. Some of the laws are politically driven to address the current situations including the introduction of the AFNA 2018.

Whilst Article 10(2) (a) of the Federal Constitution allows the Parliament to pass law on eight grounds to restrict free speech, Article 10(4) of the Federal Constitution restricts the act of questioning four highly sensitive issues in Malaysia. In addition, Articles 149 and 150 of the Federal Constitution provided two more grounds to restraint free speech. The grounds are provided in the following table:

Table 1: Constitutional grounds to restrict free speech in Malaysia.

Article	Grounds	Restrictions	Law Enacted
Art 10(2)(a)	Security	Allows any legislative measure to restrict the freedom of speech under any of the eight grounds	Security Offences (Special Measures) Act 2012 & Official Secret Act 1972
	Friendly relation with other countries		
	Public order		Sedition Act 1948, Police Act 1967 & Printing Presses & Publications Act 1984
	Morality		Film Censorship Act 2002 & Printing Presses & Publications Act 1984
	Protection of the privileges of Parliament/SLA		House of Parliament (Privileges & Powers) Act 1952 & the Standing Orders
	Contempt of Court		Courts of Judicature Act 1964
	Defamation		Defamation Act 1957
	Incitement to any offence		Obscenity under sections 292-294 of Penal Code
Art 10(4)	Rights to citizenship (Part III of the Federal Constitution)	Allows any legislative effort to restrain the questioning of the four matters	Adopted under section 3(1)(f) of the Sedition Act 1948
	Status of the Malay language (Art 152)		
	Position and privileges of the		

	Malays and native of Sabah and Sarawak (Art 153)		
	Sovereignty and prerogative of the Malay Rulers (Art 181)		
Art 149	Subversion, organised violence & crime prejudicial to public order	Permits any legislative action that infringe the freedom of speech under Article 10(1)	Security Offences (Special Measures) Act 2012 & Sedition Act 1948
Art 150	Allows any laws required by reason of an emergency	Permits any legislative measure that changes the provision of the Federal Constitution except for six grounds, by which freedom of speech is not included Article 150(6A)	Emergency (Essential powers) Ordinance No. 1, Emergency (Essential powers) Ordinance No. 2 & Emergency (Security Cases) Regulations 1975. These ordinances and regulation have been repealed in 2011.

The above table illustrates the extensive power of the Malaysian Parliament granted by the Federal Constitution to enact laws restraining the right to freedom of speech and expression under fourteen grounds.

3.2 The Anti-fake News Act 2018

The AFNA 2018 consists of four parts and fourteen sections. This law has an extra-territorial application under Section 3 of the AFNA 2018. It is also applicable to Malaysian and foreigner outside

Malaysia provided that the fake news concerns Malaysia or any Malaysian. Section 2 of the AFNA 2018 defines ‘fake news’ to include the following:

Any news, information, data, and reports, which is or are wholly or partly false, whether in the form of features, visuals, or audio recordings or in any form capable of suggesting words or ideas.

The abovementioned definition claimed to be so general and judicial interpretations are needed to determine the meaning of fake news whereby under the former regime demonstrated a heavy disposition towards the ruling party (Hutt, 2018). The broad meaning of ‘fake news’ covers public and private communications; actual reporting and online gossiping; and media inaccurate information and an individual lying text message (Lim, 2018; Hutt, 2018). Furthermore, the term ‘fake news’ also creates a twist, ‘a content that is fake cannot be news’ (Lim, 2018). The blurring aspect of the meaning of ‘fake news’ can easily be used to infringe the peoples’ right to freedom of speech and expression. In other jurisdiction, academics and non-governmental organisations took initiatives to define fake news and to discuss the viability of workable solutions (Baron & Crootof, 2017).

The AFNA 2018 creates six new offences. First, knowingly and maliciously creates, offers, publishes, prints, distributes, circulates or disseminates fake news or publication of fake news. Second, the act of providing financial assistance for purpose committing or facilitating offences under Section 4; and intends or knows or have reasonable grounds to believe financial assistance will be used for fake news. Third, failure to carry out duty to remove fake news content after knowing or having reasonable grounds to believe it is fake news. While the fourth offence is about a failure to comply court order for removal of publication containing fake news, the fifth offence is abetment or assisting in any of the above offence. Sixth, the AFNA 2018 criminalises the act done by a corporation and any officer of the corporation may deem to be severally or jointly liable for the same offence.

The offences are illustrated in further details in the following table:

Table 2: Offences under the AFNA 2018.

Section	Offence	Penalty	Additional Order/ Condition
S 4	Maliciously creates, offers, publishes,	Maximum RM500,000 fine/	Failure to make an apology as ordered by

	prints, distributes, circulates/ disseminates fake news/ publication of fake news	maximum 10-year jail/ both Maximum daily RM3000 fine if offence continues after conviction	Court shall be punishable as a contempt of court
S 5	Provides financial assistance for purpose committing / facilitating offences under section 4 / intends/ knows/ have reasonable grounds to believe financial assistance will be used for fake news	Maximum RM500,000 fine/ maximum 10-year jail/ both	
S 6	Failure to carry out duty to remove fake news content after knowing/ having reasonable grounds to believe it is fake news	Maximum RM100,000 fine Maximum daily RM3000 fine if offence continues after conviction	
S7	Failure to comply court order for removal of publication containing fake news	Maximum RM100,000 fine	Court order can be served by post or by electronic means including emails
S8			May apply to set aside of order for removal of publication containing fake news provided not under the grounds of prejudicial

			to public order/ national security
S9			Non-compliance, court may order police officer to remove publications of fake news
S10	Abetment (assisting) in any of the above offence	Punishment provided for the offence	
S13	Offence by body corporate	Punishment provided for the offence	Any officer of the corporation may deem to be severally or jointly liable unless proven that he or she has no knowledge/ not consented/ taken reasonable precautions

The abovementioned offences highlight few significant implications to individuals and corporations. Section 4 of the AFNA 2018 criminalises a range of online activities from creating, uploading, blogging, posting, reposting, forwarding, retweeting and sharing a link of the fake news in the social media and other platforms. Thus, a click or a tap of retweeting the fake news may cause an individual to be imprisoned 10 years or lesser or to be fined RM500,000.00 or lesser or both. Section 4 of the AFNA 2018 also provides few scenarios to illustrate the online activities including the scenario such as 'A publishes an advertisement about a person Z as a successful investor, when Z was never involved in such activity. A is guilty'. Critics argued that the ubiquitous nature of the Internet and the advancement of the technology make it difficult to control the dissemination of the online fake news (Shanmugam, 2018). It will be more challenging if it is disseminated by a foreigner in a foreign country.

Section 6 of the AFNA 2018 states that once a person realised that he or she communicates the fake news, there is a duty to remove or to delete the news. This creates a burden to the individuals and may also apply to the administrators of social media platforms including Google, Twitter and Whatsapp (Lim, 2018).

3.3 The Communications and Multimedia Act 1998

The Communications and Multimedia Act 1998 (hereinafter 'the CMA 1998') governs the online content. Two essential sections addressing false or fake contents are Sections 211 and 233 of the CMA 1998. Section 211 of the CMA 1998 prohibits the use of content applications service by a person to provide any content that is deemed to be false and with intent to annoy or abuse another person. Section 233 of the CMA 1998 disallows the use of network facilities or network services by a person to transmit any communication that is deemed to be false and with intent to annoy or abuse another person. Both sections impose a maximum fine of RM50,000 or a maximum one-year jail term or both, and a further fine of RM1,000 for every day the offence is continued after conviction.

On 13th April 2018, two individuals were fined RM3,000 each for fake postings on social media over the seizure of seventy-four containers containing beef, lamb and pork in the previous year (Nazlina, 2018). Both were charged under Section 233(1) (a) of the CMA 1998. In 2017, forty individuals had been investigated by the Malaysian Communications and Multimedia Commission (hereinafter 'the MCMC') and four were charged for spreading and sharing false news (Jaafar, Wan Alias & Shamsuddin, 2018). The former Minister of Communications and Multimedia Datuk Seri Salleh Said Keruak highlighted the creation of many fake social media accounts on Facebook and Twitter which intended to spread false content that 'might adversely impact the country's social and economic well-being, as well as national security' (Jun, 2017). In 2017, 2,000 fake accounts were investigated by the MCMC and 1,500 fake accounts were put into action including blocking and closing the accounts (Jun, 2017).

Section 233 of the CMA 1998 invokes a chilling effect on the freedom of speech and expression (Thiru, 2015). Under this Section, any person who disagrees with any statement made online by any other person to the extent that it arouses a feeling of hurt and disgust in him, could immediately use this Section as a tool not only to silence out the other

person whose opinion he finds disagreeable and also to use to the might of the State in punishing him for something which any reasonable person is entitled to express under freedom of speech. Thiru (2015) echoed that the continuous application of the said section to restraint views, discourse and expression, and to limit democratic space, ‘creates a climate of fear that threatens to silence Malaysians’.

Malaysian media landscape witnesses a group of victims charged under this Section ranging from a radio journalist, the *Malaysian Insider* editor, a whistleblower of *Sarawak Report*, a political analyst to a former Chief Minister (Thiru, 2015). This development evidenced the effectiveness of the said section to control false content to the extent that it received a heavy criticism on the implementation of the law (Thiru, 2015).

3.4 The Printing Presses and Publications Act 1984

The Printing Presses and Publication Act 1984 (hereinafter ‘the PPPA 1984’) defines the phrase ‘newspaper’ and ‘publication’ to include a wide range of documents including reports, visible representations and anything capable of suggesting words or ideas. Section 8A (1) of the PPPA 1984 creates an offence for maliciously published false news. All the parties involved including the printer, publisher, editor and the writer shall be subjected to imprisonment not exceeding three years or to a fine not exceeding twenty thousand ringgit or to both. The news is malicious if the accused failed to prove that he took reasonable measures to verify the truth of the news under section 8A (2) of the PPPA 1984.

Section 8A of the PPPA 1984 has been applied in a number of cases receiving media attention. Irene Fernandez, a renowned journalist, who wrote about the alleged abuse of illegal immigrants, was convicted under this section (Faruqi, 2008). Irene was imprisoned for 12 months after she appeared in court 310 times. ARTICLE 19 & SUARAM (2005) claimed that this case was the longest running trial in the legal history of Malaysia.

In the case of *Lim Guan Eng v PP* [1988] 3 MLJ 14, the accused, a Member of Parliament, published pamphlets containing the phrase ‘victim imprisoned, criminal free’. The phrase ‘victim imprisoned’ was held to be false and malicious. The victim, 16 years old was gang raped and later was ordered to undergo rehabilitation at a centre. In addition, she also alleged been sexually violated by a former chief minister. The charge against the politician was dropped due to lack of evidence.

The constitutionality of Section 8A was tested in the case of *PP v Pung Chen Choon* (1994) 1 MLJ 566. The reasoning behind the review was rejected on the said section invoking a blanket restriction on false news without connecting the restraint to the grounds permitted under Article 10 (2) of the Federal Constitution (Faruqi, 2008).

3.5 Penal Code

The Penal Code (hereinafter ‘the PC’) criminalises an act of disseminating of false reports. Section 124I of the PC provides that it is an offence to orally spread false reports or to make the false statements in writing in any newspaper, periodical, book, circular, or other printed publication or electronic means and likely to cause public alarm. An individual can be imprisoned for five years. The provision highlights that false reports can be disseminated using either traditional printed documents or electronic media including social media platforms, in which the AFNA 2018 has a similar parameter.

The offence does not count the act of creating the false reports as in the AFNA 2018. However, if the false report is disseminated, the crime is committed. Furthermore, this provision clearly constructs the implication of the action ie ‘likely to cause public alarm’. In order words, if a false report does not cause public alarm, the individual may rebut the charge against him or her.

3.6 Comparative Analysis

The above discussions on controlling fake news encapsulates few significant closures in the following table.

Table 3: Selective types of offences and punishments.

Legislation	Section	Offence	Punishment	Additional Order
The AFNA 2018	S4	Maliciously creates, offers, publishes, prints, distributes, circulates / disseminates fake news/	Maximum RM500,000 fine/ maximum 10-year jail/ both	Maximum daily RM3000 fine if offence continues after conviction Failure to make an

		publicati on of fake news		apology as ordered by Court shall be punisha ble as a contem pt of court
The CMA 1998	S233	Knowingly makes, creates, solicits and initiates the transmission of false content by means of network facilities or network services with intent to annoy or abuse another person	Maximum RM50,000 / one year imprisonment/ both	Maximum daily RM1000 fine if offence continues after conviction
The PPPA 1984	S8A	Maliciously published false news	Maximum RM20,000 / three years imprisonment/ both	
The Penal Code	S124 I	Orally spread false reports or to make the false statements in writing in any newspaper, periodical, book, circular, or other printed publication	Maximum 5 years imprisonment	

		on or electronic means and likely to cause public alarm		
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The existing law ie the CMA 1998, the PPPA 1984 and the PC reflected the applicability of the legislation to address the online fake news with a lesser degree of punishment. The said legislation also provide a clear implication of the criminal mind or mens rea in order to punish an individual in particular, the Penal Code with ‘likely to cause public alarm’ and the CMA 1998 with ‘an intent to annoy or abuse another person’. The CMA 1998 is broad enough to play the devil’s advocate on the fake news law dichotomy. Furthermore, the broad and vague nature of the AFNA 2018 may breach the right to the freedom of speech by placing a burden to individuals and social media administrators to remove the fake news once known to them.

4 CONCLUSIONS

In short, the introduction of the AFNA 2018 provides specific platform or sui generis to address the proliferation of the false news. However, the existence of other relevant laws creating an overlapping jurisdiction and multiple approaches dealing with a similar online content raises concern. In addition, a number of flaws identified under the AFNA 2018 requires urgent action from the relevant authorities including the vagueness of the AFNA 2018.

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