

Enforcement of Sharia Criminal Offences in Cyberspace: Challenges from Malaysian Legal Perspective

Suhaizad Saifuddin* 

Faculty of Law, Universiti Kebangsaan Malaysia, Malaysia

Fatimah Yusro Hashim 

Faculty of Law, Universiti Kebangsaan Malaysia, Malaysia

Mohd Zamre Mohd Zahir 

Faculty of Law, Universiti Kebangsaan Malaysia, Malaysia

Asma Hakimah Ab Halim 

Faculty of Law, Universiti Kebangsaan Malaysia, Malaysia

(*) corresponding author, email: suhaizad@ukm.edu.my

Submitted: 22 December 2024 | Reviewed: 20 January 2025 | Revised: 5 June 2025 | Accepted: 20 June 2025

Abstract

The enforcement of Sharia criminal law in Malaysia faces substantial challenges in the digital era, where technological advancements have blurred traditional legal boundaries. Certain Sharia criminal offences committed in cyberspace remain difficult to prosecute due to jurisdictional limitations, evidentiary constraints, and the absence of specific legal provisions. These challenges underscore a growing disconnect between the enforcement of Sharia criminal law and the rapid evolution of digital technologies. This article examines the enforcement of Sharia criminal offences in cyberspace from the Malaysian legal perspective and proposes practical legal solutions to bridge the identified gaps. Employing a qualitative and doctrinal methodology, data were gathered through library-based research, statutory analysis, a review of reported cases, and relevant newspaper reports. The data were analysed using content analysis and descriptive methods. In addition, a comparative approach was adopted to assess the extent to which evidentiary and procedural frameworks from the common legal system in Malaysia could be adapted to enhance the effectiveness of Sharia criminal enforcement. In response, this article recommends targeted legislative reforms to enhance the Sharia legal system's capacity to address cyber-related offences, thereby ensuring that the enforcement of Sharia criminal law remains relevant and effective in the context of modern technological developments.

Keywords: *Sharia Crime, Cyberspace, Sharia Law.*



INTRODUCTION

The rapid advancement of technology and the widespread use of digital platforms have significantly expanded the scope and opportunity for criminal offences to be committed swiftly and without geographical limitations. Cybercrime is a form of unlawful activity facilitated through electronic devices connected to internet services, enabling individuals or organized groups to carry out criminal acts across borders within a short period.¹ The borderless nature of cyberspace and its anonymity pose substantial challenges to traditional legal frameworks and enforcement mechanisms. Importantly, Sharia criminal offences are not insulated from this digital transformation. The cyberspace medium has become a new avenue for the commission of various offences under Islamic law, thereby complicating the enforcement landscape in Malaysia.² Among the Sharia offences that have increasingly migrated to the digital domain are those relating to the faith and belief (*aqidah*), such as the dissemination of deviant teachings and unauthorised religious instruction. Other offences include online gambling, acts of adultery or indecency facilitated through digital platforms, and the misuse of online donation appeals for unethical or fraudulent purposes. The global nature of online communication exacerbates these violations, as well as the ease of access to digital content and the rapid spread of information via social media. If left unaddressed, such offences have the potential to undermine social order, moral values, and the religious harmony of the Muslim community in Malaysia. Hence, the digital dimension of Sharia crimes calls for re-evaluating current legal and enforcement mechanisms. This article examines the emerging legal challenges associated with enforcing Sharia criminal law in the age of cyberspace. It also seeks to propose viable and sustainable solutions to enhance enforcement efficacy in line with contemporary technological realities.

¹ Maria Alberta Liza Quintarti et al., 'The Role of Criminal Law in Handling Cyber Crimes: Challenges and Solutions', *IJHESS: International Journal of Health, Economics, and Social Sciences* 6, no. 4 (October 2024): 1156–59, <https://doi.org/10.56338/ijhess.v6i4.6269>.

² Ahmad Yunus Mohd Noor and Asmilyia Mohd Mokhtar, 'Sains Tauhidik: Kolaborasi Ilmu antara Al-Qur'an dan Sains Modern', *Akademika: Jurnal Sains Sosial dan Kemanusiaan Asia Tenggara* 91, no. 2 (July 2021): 167–76, <https://doi.org/10.17576/akad-2021-9102-14>.

METHODOLOGY

This paper adopts a qualitative research approach by applying doctrinal legal research methodology. The focus is on analyzing legal principles, statutory provisions, and judicial decisions that pertain to the enforcement of Sharia criminal offences within the digital domain in Malaysia. Data is obtained from both primary and secondary sources. Primary sources include legal documents such as statutes, enactments, and reported case law, which are analyzed to understand the legal framework and judicial interpretation of Sharia criminal enforcement in cyberspace. These materials provide the authoritative basis for understanding the current legal position and its practical challenges. Secondary sources comprise classical Islamic texts, contemporary books, journal articles, and credible newspaper reports. These sources are utilized to contextualize the legal discussion, offer scholarly perspectives, and highlight emerging issues relating to the topic.

The study employs a combination of content analysis and descriptive analysis to analyze the collected data. Content analysis allows for the systematic examination of textual materials to identify patterns, themes, and legal arguments. Meanwhile, the descriptive method is used to explain the current state of the law and enforcement practices in a clear and structured manner, facilitating a comprehensive understanding of the legal challenges of Sharia offences in cyberspace. Additionally, a comparative approach is applied to examine the extent to which specific procedural, evidentiary, and enforcement frameworks used in the Malaysian civil courts, which operate under a common law system, could be adapted to strengthen the implementation of Sharia criminal laws, particularly in the context of cyber-related offences. This methodology enables the researcher to critically evaluate the adequacy of the existing legal framework and enforcement mechanisms and to propose potential legal and policy reforms from Sharia law perspectives.

RESULT AND DISCUSSION

Jurisdiction of Sharia Criminal Law in Malaysia

The Federal Constitution, the supreme law in Malaysia, has placed the jurisdiction over Sharia criminal cases under state authority as stipulated in List II of the Ninth Schedule. However, the sentencing jurisdiction for Sharia criminal cases in the country remains subject to federal control through the Sharia Courts (Criminal Jurisdiction) Act 1965 (Amendment 1984) (Act 355), which limits punishments to a maximum fine of five thousand ringgit, three years' imprisonment, and six strokes of the cane. As a result, the scope of each substantive enactment governing Sharia criminal offences is confined within the jurisdictional limits set by this Act. In addition to sentencing powers, establishing Sharia criminal law in Malaysia is also bound by local territorial jurisdiction. Therefore, an individual accused of committing an offence in a particular state is subject only to the laws applicable in that state.

This jurisdictional limitation is provided under sections 67 and 68 of the Sharia Criminal Procedure (Federal Territories) Act 1997 (Act 560). According to Section 67 of Act 560, every offence shall be tried by the court located within the territorial limits where the offence was committed. Meanwhile, Section 68 of the same Act stipulates that the accused may be tried either at the location where the act occurred, where the consequences of the act took place, or within any area that falls under the court's territorial jurisdiction. Furthermore, the enforcement of Sharia criminal law in Malaysia applies exclusively to Muslims. This is clearly stated in Section 1(1) of the Sharia Criminal Offences (Federal Territories) Act 1997 (Act 559), which limits the application and enforcement of the Act to Muslims only.³

Sharia Criminal Offences in Malaysian Cyberspace

Among the Sharia criminal offences frequently committed in cyberspace are those related to the faith and belief (*aqidah*) of Muslims. In Malaysia, the government has become increasingly concerned about various emerging issues, including the spread of deviant teachings, apostasy, demands for human rights by certain groups, and the

³ Shamrahayu A. Aziz, 'Islamic Criminal Law in the Malaysian Federal Structure: A Constitutional Perspective', *IIUM Law Journal* 15, no. 1 (15 July 2012): 101–20, <https://doi.org/10.31436/iiumlj.v15i1.62>.

rise of religious extremism.⁴ These developments are seen as potential threats to national security and the sanctity of Islam.⁵ Cases brought before the courts, such as those involving apostasy, religious insults, the implementation of *hudud* law, and disputes over specific religious terms, reflect the persistence of religious conflicts in the country. These tensions are unsurprising, given the pluralistic nature of Malaysian society and its people's differing interpretations of religion and culture.⁶

In 2021, Malaysia was shocked by the case of Masitah Ad Jalar, also known as "Sittah Annur", who was identified as the leader of the deviant sect "Perjalanan Mimpi Yang Terakhir" (PMYT). She propagated teachings that contravened Islamic beliefs through several social media platforms, including YouTube, Facebook, and TikTok. In a viral video, she claimed to have direct communication with Allah, angels, and the Prophet Muhammad (PBUH), and alleged that her dreams had been divinely revealed to guide the ummah. She further claimed that anyone who opposed her teachings could face divine punishment, including death.⁷ She was subsequently arrested and investigated under Section 298A of the Penal Code and Section 233 of the Communications and Multimedia Act 1998, for inciting religious disharmony and misusing network services. However, she was not prosecuted in court after publicly declaring her repentance.⁸ In the same year, authorities arrested a non-Muslim man for uploading a 3-minute 11-second video clip on YouTube under the account "Happy Family Malaysia", which featured him allegedly attempting to proselytize Muslim women. The case raised concerns among the Muslim community. It was investigated under Section 4(1) of the Sedition Act 1948, Section

⁴ Norman Zakiyy and Hasnizam Hashim, 'Setbacks Impeding Litigation of Deviant Teachings in Cyberspace', *International Journal of Business and Technology Management* 5, no. 4 (1 December 2023): 154–62, <https://doi.org/10.55057/ijbtm.2023.5.4.14>.

⁵ Mohd Norhusairi Mat Hussin et al., 'Kajian Isu-Isu berkaitan Pemeliharaan Akidah dan Pemikiran Umat Islam di Malaysia', *MJSL: Malaysian Journal of Syariah and Law* 11, no. 2 (5 December 2023): 366–80, <https://doi.org/10.33102/mjssl.vol11no2.454>.

⁶ Safiyyah Ahmad Sabri and Zaridah Abdullah, 'News Reporting on Religious Issues: Malaysian Media Practitioners' Perspective', *Jurnal Komunikasi: Malaysian Journal of Communication* 38, no. 3 (30 September 2022): 291–303, <https://doi.org/10.17576/JKMJC-2022-3803-18>.

⁷ FMT Reporters, "Sittah Annur" Wanita Didakwa Ketua Ajaran Sesat Ditahan, Free Malaysia Today, 4 September 2021, <https://www.freemalaysiatoday.com/category/bahasa/tempatan/2021/09/04/sittah-annur-wanita-didakwa-ketua-ajaran-sesat-ditahan/>.

⁸ Astro Awani, 'Sittah Annur PMYT Bertaubat: "Saya Insaf, Tiada Jalan Pintas ke Syurga"', Astro Awani, 27 September 2021, <https://www.astroawani.com/berita-malaysia/sittah-annur-pmyt-bertaubat-saya-insaf-tiada-jalan-pintas-ke-syurga-322090>.

298 and Section 505(c) of the Penal Code, and Section 233 of the Communications and Multimedia Act 1998.⁹

In 2022, a Muslim man was charged with mocking Islam and insulting the Prophet Muhammad (PBUH) by uploading obscene and offensive content via the YouTube platform. He was charged under Section 233(1)(a) of the Communications and Multimedia Act 1998, to which he pleaded guilty and was sentenced to a fine of RM50,000 or six months' imprisonment in default of payment.¹⁰ On 28 February 2023, Wan Masri Wan Mohd, founder of the heretical teachings under the Zikir Asmaul Husna Group, was charged at the Seremban Sharia High Court under Section 52 of the Sharia Criminal Offences (Negeri Sembilan) Enactment 1992 (amended 2019) for spreading false religious teachings. Although the charge did not directly involve cyberspace, it is widely known that the propagation of her teachings occurred primarily via social media. The accused pleaded not guilty and requested a trial.¹¹ A few months later, another viral incident emerged through a 1-minute 17-second TikTok video featuring four men endorsing the teachings of "Si Hulk" or Suhaini bin Mohammad, in which they uttered statements deviant from Islamic creed, including claims that Prophet Muhammad (PBUH) is a god. Authorities managed to identify the individuals involved, but no further legal action has been reported.¹² In November 2023, the Terengganu Fatwa Committee declared the teachings of Mohd Mohib Khouli Nazem as deviant and contradicting the Islamic faith. Despite this ruling, the individual known on Facebook as "Mohid Khouli" remained active in delivering online lectures promoting his deviant ideology.¹³ In

⁹ Nor Azizah Mokhtar, 'Polis Tahan Lelaki Mengaku Murtadkan Wanita', Berita Harian Online, 9 March 2021, <https://www.bharian.com.my/berita/kes/2021/03/794478/polis-tahan-lelaki-mengaku-murtadkan-wanita>.

¹⁰ Samadi Ahmad, 'Penghantar Makanan Didenda RM50,000 Hina Islam, Rasulullah SAW', Berita Harian Online, 21 July 2022, <https://www.bharian.com.my/berita/nasional/2022/07/978680/penghantar-makanan-didenda-rm50000-hina-islam-rasulullah-saw>.

¹¹ Nor Shafawati Yup, 'Pengasas Ajaran Sesat Kumpulan Zikir Asmaul Husna Tidak Mengaku Sebar Ajaran Salah', Utusan Malaysia, 28 February 2023, <https://www.utusan.com.my/berita/2023/02/pengasas-ajaran-sesat-kumpulan-zikir-asmaul-husna-tidak-mengaku-sebar-ajaran-salah/>.

¹² Mary Victoria Dass, '6 Ahli Ajaran Sesat Si Hulk Hina Nabi Di Tiktok Dikenal Pasti', Berita Harian Online, 23 March 2023, <https://www.bharian.com.my/berita/kes/2023/03/1080894/6-ahli-ajaran-sesat-si-hulk-hina-nabi-di-tiktok-dikenal-pasti>.

¹³ Faizul Azlan Razak, 'Terengganu Fatwa Ajaran Mhd Mohib Khouli Nazem Sesat, Bercanggah Akidah Islam', Berita Harian Online, 17 November 2023, <https://www.bharian.com.my/berita/nasional/2023/11/1178261/terengganu-fatwa-ajaran-mhd-mohib-khouli-nazem-sesat-bercanggah>.

December 2023, another case that drew national attention involved Khairul Adha, who declared himself the Imam Mahdi via Facebook. The Department of Islamic Development Malaysia (JAKIM) and the Selangor Islamic Religious Department (JAIS) identified his location and planned to engage with him directly. This is part of ongoing efforts by the authorities to mitigate cyber-related threats to Islamic faith and public order.¹⁴

Apart from faith-related offences, online gambling has also become increasingly prevalent among Muslims in Malaysia.¹⁵ Two primary modus operandi for online gambling activities have been identified. The first involves using eateries or food premises as gathering spots. At these locations, customers participate in group gambling sessions typically involving no more than six individuals while utilising the broadband (Wi-Fi) service provided at the premises. The restaurant operator often facilitates, discreetly distributing tablets to the players. Each group is overseen by a designated “guardian” or supervisor, who is responsible for managing the gambling credits and ensuring the smooth operation of the session. The second method involves the use of a smartphone application. The gambling operator provides a link that directs the player to download the application. Once installed, the player uses their mobile internet data to access the app, with login credentials (username and password) supplied by the operator. Through this method, players can gamble remotely without being physically present at a gambling location. These online gambling activities have seen a significant increase across the country. Syndicates often target individuals who are confined at home, particularly habitual gamblers, using various promotional tactics and incentives. Data shows that in 2022, a total of 370 Muslim women were arrested in one state for acting as agents in promoting online gambling. By mid-2023, an additional 67 Muslim women were

¹⁴ Tuan Buqhairah Tuan Muhamad Adnan, ‘Jakim Panggil “Imam Mahdi”’, *Sinar Harian*, 1 December 2023, <https://www.sinarharian.com.my/article/637480/berita/nasional/jakim-panggil-imam-mahdi>.

¹⁵ Guru Dhillon et al., ‘Online Gambling in Malaysia: A Legal Analysis’, *Pertanika: Journal of Social Sciences and Humanities* 29, no. 1 (26 March 2021): 207–20, <https://doi.org/10.47836/pjssh.29.1.12>.

detained for similar offences. One of the primary motivations for their involvement is the promise of a lucrative and fast daily income.¹⁶

In addition, cases involving moral offences, particularly those related to adultery and indecent conduct occurring in cyberspace among Muslims in Malaysia, have become increasingly alarming. In January 2024, a Muslim man known as "Daddy Ash" went viral on the X platform (formerly Twitter) alongside two Muslim women and was subsequently charged at the Kuala Lumpur Sessions Court for promoting prostitution services. The group had uploaded sexually explicit content on the platform, sold the content to the public, and offered online sexual services. More concerning is the recent crackdown by the Malaysian Communications and Multimedia Commission (MCMC), in collaboration with the Royal Malaysia Police (PDRM), on swinger activities detected in the states of Kedah and Johor. These activities, conducted via online platforms, involved married couples engaging in partner-swapping arrangements. The operations were uncovered following public complaints and through digital surveillance conducted by MCMC. These acts, which predominantly involve Muslim individuals, are not only morally reprehensible but also pose a serious threat to the ethical fabric of society. If left unchecked, such behaviour may normalise deviance and undermine the religious and social values that form the foundation of the Malaysian Muslim community. Therefore, immediate and decisive action is required to curb these activities and prevent their spread through digital platforms.¹⁷

Recently, Malaysia was shaken by a case of online donation fraud involving a husband-and-wife influencer couple and two other individuals who operated a digital fundraising platform. The group allegedly misused the cyber platform "*JomDonate*" to solicit funds from the public under the guise of charitable and

¹⁶ Mohd Rafie Azimi, 'Polis Kedah Bimbang Ramai Wanita Islam Jadi Ejen Judi dalam Talian', Utusan Malaysia, 17 June 2023, <https://www.utusan.com.my/berita/2023/06/polis-kedah-bimbang-ramai-wanita-islam-jadi-ejen-judi-dalam-talian/>.

¹⁷ Ahmad Ismadi Ismail, 'Kegiatan "Swinger" Suami Isteri Tukar Pasangan, Jual Video Lucah Tumpas', Sinar Harian, 3 April 2024, <https://www.sinarharian.com.my/article/658034/berita/semasa/kegiatan-s Swinger-suami-isteri-tukar-pasangan-jual-video-lucah-tumpas>.

religious purposes.¹⁸ In recent years, the collection of donations related to Islamic religious affairs—such as the construction of mosques and religious schools (*madrasahs*), as well as religious initiatives including *qurban* contributions, *infak al-Quran*, and other religious programmes has increasingly migrated to online platforms, particularly social media. With sophisticated digital technology, donating has become more accessible and convenient for the public. However, this convenience also opens the door to exploitation. When religious causes are used as a cover for fraud, the repercussions go beyond financial loss; they undermine public trust, damage the integrity of religious institutions, and threaten social cohesion. Such cases should not be taken lightly, as they pose a serious moral and societal risk. If left unchecked, these abuses can become destructive, eroding faith in genuine charitable efforts and becoming a 'cancer' within the community.¹⁹

Challenges in Enforcing Sharia Criminal Offences in Malaysian Cyberspace

Most Sharia criminal offences committed in cyberspace cannot be effectively enforced under existing Sharia legal frameworks. This is primarily due to several legal and procedural challenges, particularly concerning investigation processes and the collection of admissible digital evidence. These constraints make it difficult for Sharia enforcement agencies to prosecute offenders under Sharia law, mainly when they occur across digital platforms with limited jurisdictional reach. As a result, many cyber-related Sharia offences have not been tried in the Sharia Court. Still, they are instead prosecuted under the Civil Courts, often relying on provisions within federal legislation (the Penal Code or the Communications and Multimedia Act 1998).

Regarding investigation, the Religious Enforcement Officer is pivotal in conducting inquiries and collecting the necessary evidence before submitting the case to the prosecution.²⁰ During this stage, the investigating officer is responsible for recording

¹⁸ Noor Azlida Alimin, 'Alif Teega, Aisyah Hijanah Kekal Direman', *Sinar Harian*, 12 July 2024, <https://www.sinarharian.com.my/article/674715/berita/semasa/alif-teega-aisyah-hijanah-kekal-direman>.

¹⁹ Rafisah Mat Radzi et al., 'Islamic Donations-Based Crowdfunding Platforms in Malaysia: An Evaluation of Regulatory and Shariah Issues', *Petita: Jurnal Kajian Ilmu Hukum Dan Syariah* 9, no. 2 (11 August 2024): 413–34, <https://doi.org/10.22373/petita.v9i2.316>.

²⁰ Suhaizad Saifuddin, Hanifah Haydar Ali Tajuddin, and Fatimah Yusro Hashim, 'Meneroka Perspektif Islam Berhubung Dengan Penahanan Reman Dan Penambahbaikan Undang-Undang Tatacara Jenayah Syariah Di

and compiling all relevant evidence to support the prosecution's case in court. Once the investigation is completed, the case file is forwarded to the prosecution for review and further action. If, upon review, the prosecution finds that the documentary evidence provided by the religious authorities is insufficient or incomplete, it may return the investigation papers with a request for additional documentation or clarification. This iterative process ensures the case is adequately prepared before being brought to court.²¹ Investigation is intrinsically linked to the process of evidence gathering. In the context of criminal cases occurring in cyberspace, electronic evidence is one of the most crucial categories of modern evidence. Such evidence plays a vital role in either supporting or challenging the facts of a case in court.²² The widespread use of digital devices such as computers, mobile phones, video recorders, and digital cameras has made the collection of electronic evidence more accessible, thereby facilitating judicial proceedings. However, despite its usefulness, the submission of electronic evidence is often accompanied by various challenges. Issues such as data authenticity, chain of custody, manipulation risks, and the technical complexities of digital forensics may call into question the reliability and admissibility of the evidence in court. These factors can significantly affect the overall effectiveness of electronic evidence in Sharia and civil criminal proceedings.²³

The limited jurisdiction of Sharia criminal law to Muslims poses a significant challenge in the enforcement of Sharia criminal offences, particularly in the context of cyberspace. Under the Federal Constitution, Islamic law falls within the jurisdiction of the states as outlined in List II of the Ninth Schedule, and its application is confined exclusively to Muslims. This is stipulated in Section 1(1) of the Sharia Criminal Offences (Federal Territories) Act 1997 [Act 559]. As a result,

Malaysia', *Akademika: Jurnal Sains Sosial Dan Kemanusiaan Asia Tenggara* 95, no. 1 (30 April 2025): 477–95, <https://doi.org/10.17576/akad-2025-9501-27>.

²¹ Adibah Bahori et al., 'Evidence and Prosecution of Out-Of-Wedlock Pregnancies: A Legal Perspective of Syariah Criminal Offences in Malaysia', *UUM Journal of Legal Studies* 14, no. 1 (January 2023): 1–30, <https://doi.org/10.32890/uujls2023.14.1.1>.

²² Suhaizad Saifuddin, 'Darjah Pembuktian Bagi Pensabitan Kes: Analisis Perbandingan Menurut Perspektif Islam Dan Sistem Perundangan', *Al-Qanātir: International Journal of Islamic Studies* 34, no. 3 (May 2025): 29–47.

²³ Ramalinggam Rajamanickam, Nur Insyirah Mohamad Noh, and Anita Harun, 'Kebolehterimaan Keterangan Elektronik Di Malaysia (Admissibility of Electronic Evidence in Malaysia)', *Jurnal Undang-Undang Dan Masyarakat* 31, no. 1 (23 December 2022): 111–25, <https://doi.org/10.17576/juum-2022-31-09>.

non-Muslim individuals who are involved either directly or indirectly in offences that fall under Sharia law cannot be prosecuted under existing Sharia legal frameworks. Furthermore, religious authorities have no legal authority to compel non-Muslims to disclose information or cooperate in investigations related to Sharia criminal acts. For instance, if a telecommunication company owned by non-Muslims owns crucial data such as audio recordings or text messages that could serve as evidence in a Sharia-related investigation, religious enforcement agencies are legally limited in their ability to compel disclosure or initiate prosecution. This legal limitation hampers the effectiveness of investigations and contributes to enforcement gaps in cyber-related Sharia offences.

The place where an offence is committed is one of the essential elements in establishing a criminal charge. Section 68 of the Sharia Criminal Procedure (Federal Territories) Act 1997 [Act 560] provides that an accused person may be tried either at the location where the act was committed or where the consequences occurred. Local jurisdiction imposes territorial limitations on enforcement actions, requiring the offence to be linked to a specific geographical location. The place of wrongdoing is a critical element that must be clearly stated in a charge, in accordance with Section 68 of Act 560. However, challenges arise when crimes are committed in cyberspace, lacking a tangible or physical location. Cyberspace is often treated merely as a medium of transmission, while legal procedures continue to rely on material or territorial evidence, creating a mismatch between law and technological reality. Moreover, the absence of specific statutory provisions that serve as legal authority for investigations, particularly provisions relating to access to computerized data in cases involving Sharia criminal offences on social media, significantly hampers the investigation process. The lack of legal provisions addressing obstruction of investigations or refusal to comply with search procedures further complicates the enforcement of Sharia criminal offences in cyberspace. These gaps highlight the urgent need for legislative reform to strengthen the enforcement capacity of religious authorities in dealing with cyber-related offences.

The law of evidence is one of the most critical aspects in adjudicating any case. The presence and use of admissible evidence is a fundamental element in any trial, serving as the basis upon which sound and just judgments are rendered.²⁴ The evidentiary component must be explained clearly and comprehensively in a court's judgment, as it plays a pivotal role in upholding public confidence in the credibility and integrity of the Sharia courts. Furthermore, the proper application of evidentiary rules reflects the principles of justice and equality that the courts uphold.²⁵ However, the absence of specific legal provisions regarding the admissibility of computer-generated documents, as provided under Sections 90A, 90B, and 90C of the Evidence Act 1950 (Act 56), poses a significant challenge for the prosecution in Sharia courts. In civil and criminal courts, these provisions allow for the admission of documents such as computer-printed photographs, digital receipts, and other electronically generated materials. In contrast, their absence from the Sharia Court Evidence Enactments makes it challenging to admit key forms of digital evidence such as emails, digital videos, digital photographs, transaction logs, automated teller machine (ATM) records, instant message histories, and content from social media platforms such as Facebook, Instagram, WhatsApp, websites, and blogs. The inability to present the results of digital forensic analysis further hampers the pursuit of justice in Sharia criminal cases involving cyberspace. Without statutory provisions recognising the validity of such evidence, even credible digital findings may be rendered inadmissible. Computer-generated documents' significance has been emphasised in several civil and criminal court decisions, including *Gnanasegaran a/l Pararajasingam v Public Prosecutor* and *Hanafi Mat Hassan v Public Prosecutor*. In these cases, the courts acknowledged the importance of the statutory framework that facilitates the admissibility of digital documents, reinforcing the need for similar

²⁴ Suhaizad Saifuddin et al., 'Examining the Application of Standard of Proof in Criminal Cases: A Comparative Analysis of Islamic Law and Common Law in Malaysia', *Malaysian Journal of Syariah and Law* 12, no. 1 (31 March 2024): 11–22, <https://doi.org/10.33102/mjssl.vol12no1.491>.

²⁵ Suhaizad Saifuddin, 'Peruntukan Beban Pembuktian Di Bawah Enakmen Keterangan Mahkamah Syariah: Satu Penilaian', *Jurnal Undang-Undang Dan Masyarakat* 28, no. 2021 (2 April 2021): 78–91, <https://doi.org/10.17576/juum-2021-28-08>.

provisions to be incorporated into Sharia law. Sharia courts may face limitations in handling digital and cyber evidence cases without such legal updates.²⁶

In addition, the absence of provisions relating to presumption in publication as provided for under section 114A of the Act 56 makes it difficult for the prosecution to prove a material fact. The original purpose of this provision was to identify individuals responsible for broadcasting and disseminating seditious materials in cyberspace. For the authorities, tracking and identifying individuals involved in broadcasting or disseminating seditious material online can be difficult. Such individuals easily take advantage of hiding their identities on the internet due to the authorities' difficulty in controlling the vast and open internet. In addition, because information is easily transferred from one party to another, authorities have difficulty tracking down the original individuals responsible for disseminating the information. Without this provision, using the presumption of fact to identify the identity of a person whose name is unknown but is involved in a broadcast over the internet will be difficult. Referring to the provisions of subsection 1, the presumption of a fact applies when the prosecution succeeds in proving another fact. For example, the presumption that the suspect has made a post on a Facebook account will apply if the prosecution succeeds in proving that the suspect's name exists on the Facebook account as the administrator of the account. Suppose the prosecution fails to establish the fact. In that case, this presumption of fact does not apply.²⁷ The application of this provision is explained through several cases, such as *Ahmad Abdul Jalil v PP*²⁸ and *PP v Aszroy Achoi*.²⁹ The interpretation of the term *computer* in the Sharia Court Evidence Enactments of various states is generally regarded as outdated when compared to the Evidence Act 1950 (Act 56), which has been amended to reflect more contemporary realities. Act 56 now adopts a broader and

²⁶ Gnanasegaran a/l Pararajasingam v Public Prosecutor, [1997] 3 Malayan Law Journal (MLJ) 1 (Court of Appeal (Malaysia) 1995).

²⁷ Mohd. Sophian Zakaria and Akmal Hamdy Baharudin, *Kesalahan Media Sosial: Manual Siasatan Dan Pendakwaan*, 3rd ed. (Putrajaya: Jabatan Peguam Negara, 2021).

²⁸ Ahmad Abd Jalil v Public Prosecutor, [2015] 5 Current Law Journal (CLJ) 480 (High Court (Malaysia) 2015).

²⁹ Public Prosecutor v Aszroy bin Achoi, [2018] 8 Current Law Journal (CLJ) 762 (n.d.).

more relevant definition of *computer*, better suited to accommodate technological developments and the nature of modern digital evidence.

Furthermore, the evidentiary provisions in Act 56, such as the presumption of proper execution under Section 89, are more consistent with current legal practices. Likewise, Section 90 of Act 56, which provides a presumption for the authenticity of documents at least twenty years old, offers significant assistance in streamlining evidentiary procedures. However, these corresponding provisions are absent in most Sharia Court Evidence Enactments. Including such provisions in Sharia law would greatly assist the prosecution in presenting digital or documentary evidence³⁰ during trials involving Sharia criminal offences committed in cyberspace. The absence of updated legal definitions and procedural presumptions creates inconsistency between civil and Sharia courts. It hampers the effective administration of justice in electronic or long-standing documentary evidence cases. Based on the foregoing discussion, this article identifies several key challenges that hinder the effective enforcement of Sharia criminal offences in cyberspace, as outlined below:



Figure 1: Challenges of the Enforcement of Sharia Criminal Offences in Cyberspace

³⁰ Wan Abdul Fattah Wan Ismail et al., 'The Reality on Application and Challenges of Closed-Circuit Television (CCTV) Images as Evidence in Shariah Criminal Cases in Malaysia', *Humanities & Social Sciences Reviews* 7, no. 6 (27 November 2019): 356–61, <https://doi.org/10.18510/hssr.2019.7661>.

Figure 1 above illustrates the key challenges in enforcing Sharia criminal offences committed in cyberspace. These challenges can be categorised into three main areas: jurisdiction, investigation, and evidence. Addressing these issues is essential to ensure that the enforcement of Sharia criminal law in cyberspace can be carried out effectively, in line with the proposed recommendations presented in this article.

Proposed Solutions

In addressing the issue of jurisdiction, particularly when non-Muslim individuals or entities refuse to cooperate with religious authorities during the investigation or search process, it is proposed that religious enforcement officers lodge a police report. This would allow civil authorities to take appropriate action under Section 186 of the Penal Code, which criminalises the obstruction of public servants in discharging their duties. This approach provides a legal pathway for enforcement even when Sharia jurisdiction does not directly apply to non-Muslims, thereby ensuring that investigations are not impeded.

Furthermore, in cases involving Sharia criminal offences committed in cyberspace, the absence of a precise physical location for where the offence occurred poses a significant jurisdictional challenge. A specific provision similar to Section 153(3) of the Criminal Procedure Code (Act 593) should be introduced into Sharia procedural law to address this. This provision states that when an accused is charged with an offence related to electronic publications, the place of publication is deemed to be where any person sees, hears, or reads the material. A similar Sharia Criminal Procedure Enactment rule would enable better handling of offences committed through borderless digital platforms.

It is recommended that provisions akin to Section 116B of the Criminal Procedure Code be adopted regarding investigations. This section empowers police officers of at least Inspector rank to access computerised data during searches. Subsection (1) grants access to data stored on or linked to a computer, while subsection (2) ensures such information is admissible in court. Subsection (3) further clarifies that "access" includes any means necessary to retrieve and understand the data, such as

passwords, decryption keys, and specific software. Integrating similar provisions into Sharia law would facilitate more effective investigations into offences involving online communications and digital evidence.

Concerning evidence, the lack of statutory provisions for the admissibility of computer-generated documents within the Sharia Court Evidence Enactments poses a serious obstacle. Therefore, the principles in Sections 90A, 90B, and 90C of the Evidence Act 1950 (Act 56) are proposed to be incorporated into Sharia legal frameworks. Section 90A outlines the conditions under which documents issued by computers – such as emails, digital photos, transaction records, and receipts – can be admitted as evidence. It also includes requirements for certification by responsible officers, presumptions of authenticity, and acceptance of documents even when issued after investigations have begun. Section 90B provides guidance for courts in assessing the probative value of such documents, while Section 90C ensures these provisions take precedence over any conflicting laws.

In addition to the recommendations previously outlined, one crucial legislative improvement that should be considered is the incorporation of provisions relating to presumptions in publication, similar to those found in Section 114A of the Evidence Act 1950 (Act 56). This section is essential for dealing with offences committed in cyberspace, as it establishes a presumption regarding the identity of individuals responsible for publishing or disseminating content online. Under subsection (1), any person whose name, photograph, or pseudonym appears on a broadcast or who is identified as the broadcast's owner, administrator, or facilitator is presumed to be the originator of the content unless proven otherwise. Subsection (2) further provides that any person registered with a network service provider as the subscriber from which a broadcast originates is also presumed to be responsible. Similarly, subsection (3) states that anyone with custody or control of a computer from which the broadcast commenced is deemed the broadcaster. These presumptions are vital in cybercrime investigations, where offenders often hide behind anonymous accounts or pseudonyms. Including similar provisions in the

Sharia Court Evidence Enactments would greatly facilitate the prosecution of Sharia offences committed online.

Additionally, the definition of "computer" in the current Sharia Court Evidence Enactments across various states is outdated and not reflective of current technological developments. In contrast, Section 3 of Act 56 defines a computer more comprehensively and technologically accurately. According to this section, a computer includes any electronic, magnetic, optical, or electrochemical device, or group of interconnected devices that performs data processing functions such as logical operations, storage, and display.³¹ It includes any associated data storage or communication facility but excludes non-programmable devices such as typewriters and basic calculators. Adopting this definition would ensure broader coverage and legal clarity in handling electronic evidence in Sharia criminal cases. Furthermore, Section 88 of Act 56 provides a presumption regarding the transmission of electronic messages, including emails. It states that a message sent via telegraph or email may be presumed to have been submitted for delivery from its source. However, unless proven, no presumption may be made about whether the message has been delivered to the intended recipient. This provision supports the admissibility of digital communications such as emails, which are frequently involved in cybercrime cases. However, no equivalent provision currently exists within the Sharia Court Evidence Enactments.

In addition, provisions relating to the presumption of proper completion, as outlined in Section 89 of the Evidence Act 1950 (Act 56), should be incorporated into the Sharia Court Evidence Enactment, as such provisions are more consistent with the development of modern legal procedures. Section 89 allows the court to presume that any document requested but not submitted—after a formal notice to produce under Section 66—has been duly signed, stamped, and completed per legal requirements. This presumption is fundamental in ensuring procedural efficiency and avoiding undue delays caused by the deliberate withholding of documents.

³¹ Mohamad Aniq Aiman Alias et al., 'Wasa'il Ithbat Dalam Undang-Undang Keterangan Islam: Analisis Perundangan Terhadap Keabsahan Dokumen Elektronik Di Mahkamah Syariah Malaysia', *Malaysian Journal of Syariah and Law* 12, no. 3 (31 December 2024): 689–700, <https://doi.org/10.33102/mjssl.vol12no3.792>.

Equally significant is the inclusion of provisions similar to Section 90 of Act 56, which allows the court to make presumptions about the authenticity of documents at least twenty years old. This section provides that if such a document is produced from a custody deemed appropriate by the court, the court may presume that the document's signature and other handwritten elements are genuine and that the document was duly executed and witnessed. These presumptions are especially useful in Sharia cases involving older religious records, endowment (waqf) agreements, or historical evidence that may no longer be verifiable through direct witnesses.

Moreover, Section 114 of the Evidence Act 1950 contains several critical legal presumptions that could be adapted into the Sharia Court Evidence Enactment to assist judicial reasoning and streamline evidentiary assessments. This section enables the court to make reasonable presumptions without direct evidence, particularly useful in cases involving limited documentation or non-cooperation by parties. Among the presumptions that may be incorporated are: that judicial and official acts are presumed to have been carried out following the proper legal procedures; that in matters involving administration or business, the usual and ordinary course of conduct is deemed to have been followed; that an individual found in possession of a document pertaining to a religious teaching which has been declared deviant through an official fatwa may be presumed to be a practitioner of that teaching unless they can provide a credible and satisfactory explanation for such possession; and that evidence which is available but deliberately not produced by a party may be presumed to be unfavourable to the party withholding it. These presumptions, if adopted, would enhance the Sharia courts' ability to draw logical inferences, reduce the burden of strict proof in certain situations, and facilitate a more efficient and just adjudication process in cases involving Sharia criminal offences, particularly those occurring in cyberspace. Incorporating these provisions into the Sharia Court Evidence Enactment would significantly enhance the evidentiary framework available to religious enforcement bodies and the courts. It would allow for more flexible and realistic judicial inferences, reduce dependence on rigid forms of direct

evidence, and ensure that Sharia criminal proceedings – especially in cases involving cyberspace – are conducted with procedural integrity and practical effectiveness.

CONCLUSION

This paper concludes that the enforcement of Sharia criminal offences committed in cyberspace in Malaysia faces significant challenges in three main areas: jurisdiction, investigation, and evidence. The absence or inadequacy of legal provisions addressing these aspects has become a substantial barrier to effective enforcement. Issues such as the limited jurisdiction of Sharia law to Muslims, the lack of statutory authority for digital investigations, and the absence of comprehensive evidentiary provisions, notably concerning electronic and computer-generated evidence, have all contributed to enforcement weaknesses. As a result, many Sharia-related cyber offences are currently being prosecuted under civil law in the Civil Courts, rather than in the Sharia courts. This trend underscores a critical gap in Sharia criminal law's legal framework. Therefore, Sharia law makers at the state level must take immediate and proactive measures to update and harmonise the relevant enactments. These reforms should include the incorporation of legal presumptions, more precise definitions of computer, provisions for cross-jurisdictional cooperation, including the introduction of charging provisions for electronic content based on where it is accessed, adopting investigative powers to access digital data, and recognising the admissibility of computer-generated documents. By aligning Sharia law with contemporary technological developments, religious enforcement authorities will be better equipped to address the complex realities of cyberspace and uphold the principles of justice within the framework of Islamic law.

ACKNOWLEDGMENTS

This work is financially supported by Geran Galakan Penyelidik Muda (GGPM), Universiti Kebangsaan Malaysia (UKM), project code GGPM-2023-006.

REFERENCES

- Ahmad Abd Jalil v Public Prosecutor, [2015] 5 Current Law Journal (CLJ) 480 (High Court (Malaysia) 2015).
- Ahmad, Samadi. 'Penghantar Makanan Didenda RM50,000 Hina Islam, Rasulullah SAW'. *Berita Harian Online*, 21 July 2022. <https://www.bharian.com.my/berita/nasional/2022/07/978680/penghantar-makanan-didenda-rm50000-hina-islam-rasulullah-saw>.
- Astro Awani. 'Sittah Annur PMYT Bertaubat: "Saya Insaf, Tiada Jalan Pintas ke Syurga"'. *Astro Awani*, 27 September 2021. <https://www.astroawani.com/berita-malaysia/sittah-annur-pmyt-bertaubat-saya-insaf-tiada-jalan-pintas-ke-syurga-322090>.
- Azimi, Mohd Rafie. 'Polis Kedah Bimbang Ramai Wanita Islam Jadi Ejen Judi dalam Talian'. *Utusan Malaysia*, 17 June 2023. <https://www.utusan.com.my/berita/2023/06/polis-kedah-bimbang-ramai-wanita-islam-jadi-ejen-judi-dalam-talian/>.
- Aziz, Shamrahayu A. 'Islamic Criminal Law in the Malaysian Federal Structure: A Constitutional Perspective'. *IIUM Law Journal* 15, no. 1 (15 July 2012): 101-20. <https://doi.org/10.31436/iiumlj.v15i1.62>.
- Bahori, Adibah, Azizah Mat Rashid, Mohamad Azhan Yahya, Suhaizad Saifuddin, and Mohd Kamel Mat Salleh. 'Evidence and Prosecution of Out-Of-Wedlock Pregnancies: A Legal Perspective of Syariah Criminal Offences in Malaysia'. *UUM Journal of Legal Studies* 14, no. 1 (January 2023): 1-30. <https://doi.org/10.32890/uumljs2023.14.1.1>.
- Dass, Mary Victoria. '6 Ahli Ajaran Sesat Si Hulk Hina Nabi Di Tiktok Dikenal Pasti'. *Berita Harian Online*, 23 March 2023. <https://www.bharian.com.my/berita/kes/2023/03/1080894/6-ahli-ajaran-sesat-si-hulk-hina-nabi-di-tiktok-dikenal-pasti>.
- Dhillon, Guru, Lee Sook Ling, Jason Tze-Xi Nathan, and Maran Nandan. 'Online Gambling in Malaysia: A Legal Analysis'. *Pertanika: Journal of Social Sciences and Humanities* 29, no. 1 (26 March 2021): 207-20. <https://doi.org/10.47836/pjssh.29.1.12>.
- FMT Reporters. "'Sittah Annur" Wanita Didakwa Ketua Ajaran Sesat Ditahan'. *Free Malaysia Today*, 4 September 2021. <https://www.freemalaysiatoday.com/category/bahasa/tempatan/2021/09/04/sittah-annur-wanita-didakwa-ketua-ajaran-sesat-ditahan/>.
- Gnanasegaran a/l Pararajasingam v Public Prosecutor, [1997] 3 Malayan Law Journal (MLJ) 1 (Court of Appeal (Malaysia) 1995).
- Hussin, Mohd Norhusairi Mat, Mohd Zaidi Daud, Ruzman Md Noor, and Amalina Che Omar. 'Kajian Isu-Isu Berkaitan Pemeliharaan Akidah Dan Pemikiran

- Umat Islam Di Malaysia'. *MJSL: Malaysian Journal of Syariah and Law* 11, no. 2 (5 December 2023): 366–80. <https://doi.org/10.33102/mjssl.vol11no2.454>.
- Ismail, Ahmad Ismadi. 'Kegiatan "Swinger" Suami Isteri Tukar Pasangan, Jual Video Lucah Tumpas'. *Sinar Harian*, 3 April 2024. <https://www.sinarharian.com.my/article/658034/berita/semasa/kegiatan-swinger-suami-isteri-tukar-pasangan-jual-video-lucah-tumpas>.
- Ismail, Wan Abdul Fattah Wan, Syahirah Abdul Shukor, Hasnizam Hashim, Lukman Abdul Mutalib, and Ahmad Syukran Baharuddin. 'The Reality on Application and Challenges of Closed-Circuit Television (CCTV) Images as Evidence in Shariah Criminal Cases in Malaysia'. *Humanities & Social Sciences Reviews* 7, no. 6 (27 November 2019): 356–61. <https://doi.org/10.18510/hssr.2019.7661>.
- Mokhtar, Nor Azizah. 'Polis Tahan Lelaki Mengaku Murtadkan Wanita'. *Berita Harian Online*, 9 March 2021. <https://www.bharian.com.my/berita/kes/2021/03/794478/polis-tahan-lelaki-mengaku-murtadkan-wanita>.
- Noor, Ahmad Yunus Mohd, and Asmilyia Mohd Mokhtar. 'Sains Tauhidik: Kolaborasi Ilmu Antara Al-Qur'an Dan Sains Moden'. *Akademika: Jurnal Sains Sosial Dan Kemanusiaan Asia Tenggara* 91, no. 2 (July 2021): 167–76. <https://doi.org/10.17576/akad-2021-9102-14>.
- Noor Azlida Alimin. 'Alif Teega, Aisyah Hijanah Kekal Direman'. *Sinar Harian*, 12 July 2024. <https://www.sinarharian.com.my/article/674715/berita/semasa/alif-teega-aisyah-hijanah-kekal-direman>.
- Public Prosecutor v Aszroy bin Achoi, [2018] 8 Current Law Journal (CLJ) 762 (n.d.).
- Quintarti, Maria Alberta Liza, Riadi Asra Rahmad, Zulkarnain S, Budi Handayani, and Rica Gusmarani. 'The Role of Criminal Law in Handling Cyber Crimes: Challenges and Solutions'. *IJHESS: International Journal of Health, Economics, and Social Sciences* 6, no. 4 (October 2024): 1156–59. <https://doi.org/10.56338/ijhess.v6i4.6269>.
- Radzi, Rafisah Mat, Nurul Aini Muhamed, Muhammad Iqmal Hisham Kamaruddin, Wan Nur Fazni Wan Mohamad Nazarie, and Aimi Fadzirul Kamarubahrin. 'Islamic Donations-Based Crowdfunding Platforms in Malaysia: An Evaluation of Regulatory and Shariah Issues'. *Petita: Jurnal Kajian Ilmu Hukum Dan Syariah* 9, no. 2 (11 August 2024): 413–34. <https://doi.org/10.22373/petita.v9i2.316>.
- Rajamanickam, Ramalinggam, Nur Insyirah Mohamad Noh, and Anita Harun. 'Kebolehterimaan Keterangan Elektronik Di Malaysia (Admissibility of Electronic Evidence in Malaysia)'. *Jurnal Undang-Undang Dan Masyarakat* 31, no. 1 (23 December 2022): 111–25. <https://doi.org/10.17576/juum-2022-31-09>.
- Razak, Faizul Azlan. 'Terengganu Fatwa Ajaran Mhd Mohib Khouli Nazem Sesat, Bercanggah Akidah Islam'. *Berita Harian Online*, 17 November 2023.

- <https://www.bharian.com.my/berita/nasional/2023/11/1178261/terengganu-fatwa-ajaran-mhd-mohib-khouli-nazem-sesat-bercanggah>.
- Sabri, Safiyyah Ahmad, and Zaridah Abdullah. 'News Reporting on Religious Issues: Malaysian Media Practitioners' Perspective'. *Jurnal Komunikasi: Malaysian Journal of Communication* 38, no. 3 (30 September 2022): 291-303. <https://doi.org/10.17576/JKMJC-2022-3803-18>.
- Saifuddin, Suhaizad. 'Darjah Pembuktian Bagi Pensabitan Kes: Analisis Perbandingan Menurut Perspektif Islam Dan Sistem Perundangan'. *Al-Qanatir: International Journal of Islamic Studies* 34, no. 3 (May 2025): 29-47.
- — —. 'Peruntukan Beban Pembuktian Di Bawah Enakmen Keterangan Mahkamah Syariah: Satu Penilaian'. *Jurnal Undang-Undang Dan Masyarakat* 28, no. 2021 (2 April 2021): 78-91. <https://doi.org/10.17576/juum-2021-28-08>.
- Saifuddin, Suhaizad, Hanifah Haydar Ali Tajuddin, and Fatimah Yusro Hashim. 'Meneroka Perspektif Islam Berhubung Dengan Penahanan Reman Dan Penambahbaikan Undang-Undang Tatacara Jenayah Syariah Di Malaysia'. *Akademika: Jurnal Sains Sosial Dan Kemanusiaan Asia Tenggara* 95, no. 1 (30 April 2025): 477-95. <https://doi.org/10.17576/akad-2025-9501-27>.
- Saifuddin, Suhaizad, Hanifah Haydar Ali Tajuddin, Mohd Azhan Yahya, Mohamad Rizal Abd Rahman, and Fatimah Yusro Hashim. 'Examining the Application of Standard of Proof in Criminal Cases: A Comparative Analysis of Islamic Law and Common Law in Malaysia'. *Malaysian Journal of Syariah and Law* 12, no. 1 (31 March 2024): 11-22. <https://doi.org/10.33102/mjssl.vol12no1.491>.
- Tuan Buqhairah Tuan Muhamad Adnan. 'Jakim Panggil "Imam Mahdi"'. *Sinar Harian*, 1 December 2023. <https://www.sinarharian.com.my/article/637480/berita/nasional/jakim-panggil-imam-mahdi>.
- Yup, Nor Shafawati. 'Pengasas Ajaran Sesat Kumpulan Zikir Asmaul Husna Tidak Mengaku Sebar Ajaran Salah'. *Utusan Malaysia*, 28 February 2023. <https://www.utusan.com.my/berita/2023/02/pengasas-ajaran-sesat-kumpulan-zikir-asmaul-husna-tidak-mengaku-sebar-ajaran-salah/>.
- Zakaria, Mohd. Sophian, and Akmal Hamdy Baharudin. *Kesalahan Media Sosial: Manual Siasatan Dan Pendakwaan*. 3rd ed. Putrajaya: Jabatan Peguam Negara, 2021.
- Zakiyy, Norman, and Hasnizam Hashim. 'Setbacks Impeding Litigation of Deviant Teachings in Cyberspace'. *International Journal of Business and Technology Management* 5, no. 4 (1 December 2023): 154-62. <https://doi.org/10.55057/ijbtm.2023.5.4.14>.